



# 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: September 21, 2011

RE: Dean Baldwin Painting / 103 - 30549 - 00046

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

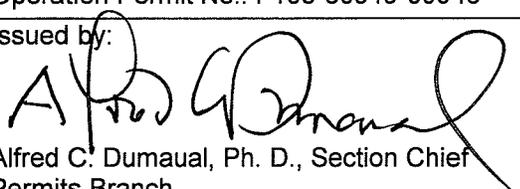
**Dean Baldwin Painting, LP  
2075 North Hoosier Boulevard  
Peru, Indiana 46971**

(herein known as the Permittee) is hereby authorized to construct and 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.: F103-30549-00046	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: September 21, 2011  Expiration Date: September 21, 2016

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY</b> .....	<b>5</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS</b> .....	<b>7</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]	
B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5 Term of Conditions [326 IAC 2-1.1-9.5]	
B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.7 Severability [326 IAC 2-8-4(4)]	
B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.14 Emergency Provisions [326 IAC 2-8-12]	
B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.17 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]	
B.18 Permit Renewal [326 IAC 2-8-3(h)]	
B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.21 Source Modification Requirement [326 IAC 2-8-11.1]	
B.22 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]	
B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.24 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]	
B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS</b> .....	<b>17</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.8 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]  
[326 IAC 2-8-5(1)]

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

- C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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

- C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23**

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

- D.1.1 Best Available Control Technology (BACT) - VOC [326 IAC 8-1-6]
- D.1.2 FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-4.1]
- D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.5 Volatile Organic Compounds

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

- D.1.6 Monitoring

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

- D.1.7 Record Keeping Requirements
- D.1.8 Reporting Requirements

**E.1. FACILITY OPERATION CONDITIONS ..... 29**

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

- E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]
- E.1.2 National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [ 40 CFR Part 63, Subpart HHHHHH]

**E.2. FACILITY OPERATION CONDITIONS ..... 32**

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

- E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]
- E.2.2 National Emission Standards for Hazardous Air Pollutants for Source Category Gasoline Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC]

Certification Form ..... 33  
Emergency Occurrence Form ..... 34  
Quarterly Report Form ..... 36  
Quarterly Deviation and Compliance Monitoring Report Form ..... 39  
Affidavit of Construction ..... 41

Attachment A: NESHAP HHHHHH  
Attachment B: NESHAP CCCCCC

## 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)]

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The Permittee owns and operates a stationary aircraft refinishing facility.

Source Address:	2075 North Hoosier Boulevard, Peru, Indiana 46971
General Source Phone Number:	(832) 438-5340
SIC Code:	4581
County Location:	Miami
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) One (1) aircraft refinishing operation, identified as REFINISH, approved for construction in 2011, consisting of multiple coating bays, with a combined nominal coating usage of 23 gallons per hour, using dry filters as particulate control, exhausting to several stacks (not to exceed 38), and consisting of:
- (1) Paint Stripping Operations, applying stripping solutions via non-atomizing wands or by hand application methods;
  - (2) Surface Cleaning Operations, applying cleaners via non-atomizing wands or by hand application methods;
  - (3) Surface Treatment Operations, applying surface treatments via HVLP, electrostatic air atomized, electrostatic airless, non-atomizing wands, or by hand application methods;
  - (4) Primer Coating Operations, applying primers via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency; and
  - (5) Topcoat Coating Operations, applying coatings via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency.

Under 40 CFR Part 63, Subpart HHHHHH, the aircraft refinishing operation (REFINISH) is considered an affected facility.

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

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This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour each, and consisting of:
  - (1) Twelve (12) air make-up unit heaters, each with a nominal capacity of 9.0 MMBtu/hr.
- (b) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.

Under 40 CFR 63, Subpart CCCCCC, the units comprising this operation are considered affected facilities.
- (c) One (1) gasoline storage tank, with up to a 1,000 gallon storage capacity.

Under 40 CFR 63, Subpart CCCCCC, the gasoline storage tank is considered an affected facility.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.
- (e) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons.
  - (2) Vessels storing hydraulic oils
- (f) Water-based activities, including the following:
  - (1) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
  - (2) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Blowdown for compressors.
- (i) Paved and unpaved roadways and parking lots.

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

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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 Revocation of Permits [326 IAC 2-1.1-9(5)]

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### B.4 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, F103-30549-00046, 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.5 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.6 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.7 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.8 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.9 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.10 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.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (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.12 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.13 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.14 Emergency Provisions [326 IAC 2-8-12]**

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- (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 Northern 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  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F103-30549-00046 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.16 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.17 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.18 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.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (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.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (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.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 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.23 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.24 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.25 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 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 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 gasses (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent (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 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 demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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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.10 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.11 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.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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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.13 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.14 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.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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

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- (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.17 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:

- (a) One (1) aircraft refinishing operation, identified as REFINISH, approved for construction in 2011, consisting of multiple coating bays, with a combined nominal coating usage of 23 gallons per hour, using dry filters as particulate control, exhausting to several stacks (not to exceed 38), and consisting of:
- (1) Paint Stripping Operations, applying stripping solutions via non-atomizing wands or by hand application methods;
  - (2) Surface Cleaning Operations, applying cleaners via non-atomizing wands or by hand application methods;
  - (3) Surface Treatment Operations, applying surface treatments via HVLP, electrostatic air atomized, electrostatic airless, non-atomizing wands, or by hand application methods;
  - (4) Primer Coating Operations, applying primers via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency; and
  - (5) Topcoat Coating Operations, applying coatings via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency.

Under 40 CFR Part 63, Subpart HHHHHH, the aircraft refinishing operation (REFINISH) 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.1.1 Best Available Control Technology (BACT) - VOC [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the Permittee shall minimize VOC emissions from the aircraft refinishing operation (REFINISH) using the Best Available Control Technology (BACT), which has been determined to be the following:

- (a) The following management and work practices shall apply to the REFINISH operation:
- (1) VOC emissions from primers shall be limited to a VOC content level of no more than: 540 g/L (4.5 lb/gal) of primer (less water and exempt solvents), as applied, and as determined on a monthly volume-weighted average.
  - (2) VOC emissions from topcoats shall be limited to a VOC content level of no more than: 540 g/L (4.5 lb/gal) of coating (less water and exempt solvents) as applied and as determined on a monthly volume-weighted average. VOC emissions from self-priming topcoats shall be limited to a VOC content level of no more than: 540 g/L (4.5 lb/gal) of self-priming topcoat (less water) as applied, and as determined on a monthly volume-weighted average.
  - (3) Place used solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers. Ensure that these bags and containers are kept closed at all times except when depositing or removing these

materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent.

- (4) Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
- (5) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
- (6) Clean spray guns by one of the following methods:
  - (A) Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun. If electing to clean spray guns by this method, the Permittee shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system, while the system is in operation, at least once per month. If leaks are found during the monthly inspection, repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed, and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued;
  - (B) Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use;
  - (C) Disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components;
  - (D) Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions; or
  - (E) Empty the used cleaning solvent each time aerospace parts or assemblies, or components of a coating unit (with the exception of spray guns) are flush cleaned into an enclosed container or collection system that is kept closed when not in use or into a system with equivalent emission control.
- (7) All primers and topcoats (including self-priming topcoats) shall be applied using one or more of the application techniques specified below:
  - (A) Flow/curtain coat application;
  - (B) Dip coat application;
  - (C) Roll coating;

- (D) Brush coating;
  - (E) Cotton-tipped swab application;
  - (F) Electrodeposition (dip) coating;
  - (G) High volume low pressure (HVLP) spraying;
  - (H) Electrostatic spray application; or
  - (I) Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods.
- (8) All application devices used to apply primers or topcoats (including self-priming topcoats) shall be operated according to company procedures, local specified operating procedures, and/or the manufacturer's specifications, whichever is most stringent, at all times. Equipment modified by the facility shall maintain a transfer efficiency equivalent to HVLP and electrostatic spray application techniques.

#### D.1.2 FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-4.1]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-4.1 (MACT) not applicable, the source shall comply with the following:

- (A) The total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, to the aircraft refinishing operation (REFINISH), minus the amount of VOC in waste shipped offsite, shall be limited to 97.30 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (B) The total input of any single HAP, including coatings, dilution solvents, and cleaning solvents, to the aircraft refinishing operation (REFINISH), minus the amount of single HAP in waste shipped offsite, shall be limited to 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (C) The total input of combined HAPs, including coatings, dilution solvents, and cleaning solvents, to the aircraft refinishing operation (REFINISH), minus the amount of combined HAPs in waste shipped offsite, shall be limited to 24.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (MACT) not applicable.

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

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the aircraft refinishing operation (REFINISH) shall be controlled by dry filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan is required for the aircraft refinishing operation (REFINISH) and the associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plans required by this condition.

### Compliance Determination Requirements

#### D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants

- (a) Compliance with the VOC and/or HAP input limitations contained in Condition D.1.2 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 and/or HAP 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.
- (b) Compliance with the VOC content limits in Conditions D.1.1(a)(1) and D.1.1(a)(2) shall be determined by the following:
- (1) For topcoats and primers complying with the VOC content limits in Conditions D.1.1(a)(1) and D.1.1(a)(2) without averaging, compliance with the VOC content limitations 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.
  - (2) For topcoats and primers that are averaged in order to comply with the primer and topcoat VOC content limits in Conditions D.1.1(a)(1) and D.1.1(a)(2), the monthly volume-weighted average VOC content per volume of coating (less water and exempt solvents) as applied, shall be determined by the following equation:

$$G_a = \frac{\sum_{i=1}^n (VOC)_{ci} V_{ci}}{C_{lwes}}$$

Where:

$G_a$  = volume weighted average mass of VOC per unit volume of coating (lb/gal) (less water and exempt solvent) as applied during each 30-day period for those coatings being averaged.

$n$  = number of coatings being averaged.

$(VOC)_{ci}$  = VOC content (lb/gal) of coating  $i$  (less water and exempt solvents) as applied that is being averaged during the 30-day period

$V_{ci}$  = volume (gal) of coating  $i$  (less water and exempt solvents) as applied that is being averaged during the 30-day period.

$C_{lwes}$  = total volume (gal) of all coatings (less water and exempt solvents) as applied during each 30-day period for those coatings being

averaged.

- (c) If the amount of VOC and/or HAPs in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC and/or HAP input reported, the Permittee shall determine the VOC and/or HAP content of the waste shipped offsite using one or a combination of the following methods:
- (1) On-Site Sampling
    - (A) VOC and/or HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
    - (B) A representative sample of the VOC and/or HAP containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this permit F103-30549-00046.
    - (C) If multiple waste streams are collected and bulked separately, a sample shall be collected and analyzed from each waste stream.
    - (D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC and/or HAP content of the VOC and/or HAP containing waste. Such change could include, but is not limited to, the following:
      - (i) A change in VOC and/or HAP material usage selection or formulation, as supplied or as applied, or
      - (ii) An operational change in the VOC and/or HAP material usage application or cleanup operations.

The new VOC and/or HAP content shall be used in calculating the amount of VOC and/or HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.
  - (2) Certified Waste Report: The VOC and/or HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC and/or HAP in the waste.
  - (3) Minimum Assumed VOC and/or HAP content: The VOC and/or HAP content of the waste shipped offsite may be assumed to be equal to the VOC and/or HAP content of the material with the lowest VOC and/or HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC and/or HAP data sheets, for each month.
- (d) IDEM reserves the right to request a representative sample of the VOC and/or HAP containing waste stream and conduct an analysis for VOC and/or HAP content.
- (e) Compliance with the VOC and HAP input limitations contained in Condition D.1.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound and/or hazardous air pollutant input for the previous month, minus the amount VOC and/or HAPs in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC and/or HAP input, minus the amount VOC and/or HAP in the waste shipped out for recycling or disposal, so as to arrive at VOC

and/or HAP input for the most recent twelve (12) consecutive month period.

- (f) The VOC and/or HAP input for a month shall be calculated using the following equation:

VOC and/or HAP input = SCL - SR

Where:

SCL = The total amount of VOC and/or HAP containing materials, in tons, including coatings, from the source; and

SR = The total amount of VOC and/or HAP containing materials, in tons, shipped out for either recycling or disposal, including coatings, from the source.

### **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 aircraft refinishing operation (REFINISH) stacks while one or more of the bays 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 aircraft refinishing operation (REFINISH) stacks 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)]**

#### **D.1.7 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.1(a)(1), D.1.1(a)(2), and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits and/or the VOC emission limits established in Conditions D.1.1(a)(1), D.1.1(a)(2), and D.1.2, and to document the quantity of any VOC and/or HAPs shipped offsite and deducted from total reported VOC and/or HAP input. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and/or HAP content of each coating material and solvent used.
- (2) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, material safety data sheets (MSDS) and/or Environmental Data Sheets (EDS) necessary to verify the type and amount used.
- (3) If the amount of VOC and/or HAPs in waste material is being deducted from the

VOC and/or HAP input as allowed in paragraph (b) of Condition D.1.5, then the following records shall be maintained:

- (A) The amount of VOC and/or HAP containing waste shipped out to be recycled or disposed each month. If multiple waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each VOC and/or HAP containing waste stream.
  - (B) The VOC and/or HAP content of the waste and all records necessary to verify the amount and VOC and/or HAP content of the VOC- and/or HAP-containing waste shipped out for recycling or disposal.
  - (C) The weight of VOC and/or HAP input, minus the weight of VOC and/or HAP shipped out to be recycled or disposed, for each compliance period.
- (4) If the topcoats and/or primers are averaged in order to comply with the VOC content limits in Conditions D.1.1(a)(1) and D.1.1(a)(2), the volume weighted average VOC content of the coatings used for the month shall be maintained.
  - (5) The total VOC and/or HAP input for each month and each compliance period.
- (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.
  - (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.8 Reporting Requirements

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A quarterly summary of the information to document the compliance status with Condition D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report 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).

## SECTION E.1 FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) aircraft refinishing operation, identified as REFINISH, approved for construction in 2011, consisting of multiple coating bays, with a combined nominal coating usage of 23 gallons per hour, using dry filters as particulate control, exhausting to several stacks (not to exceed 38), and consisting of:
- (1) Paint Stripping Operations, applying stripping solutions via non-atomizing wands or by hand application methods;
  - (2) Surface Cleaning Operations, applying cleaners via non-atomizing wands or by hand application methods;
  - (3) Surface Treatment Operations, applying surface treatments via HVLP, electrostatic air atomized, electrostatic airless, non-atomizing wands, or by hand application methods;
  - (4) Primer Coating Operations, applying primers via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency; and
  - (5) Topcoat Coating Operations, applying coatings via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency.

Under 40 CFR Part 63, Subpart HHHHHH, the aircraft refinishing operation (REFINISH) 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.)

### National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

#### E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.11174, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1 for the aircraft refinishing operation (REFINISH), as specified in Appendix A of 40 CFR Part 63, Subpart HHHHHH in accordance with the schedule in 40 CFR 63 Subpart HHHHHH.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH]

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The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment A) for the aircraft refinishing operation (REFINISH):

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

## SECTION E.2 FACILITY OPERATION CONDITIONS

### Insignificant Activities:

- (b) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.

Under 40 CFR 63, Subpart CCCCCC, the units comprising this operation are considered affected facilities.

- (c) One (1) gasoline storage tank, with up to a 1,000 gallon storage capacity.

Under 40 CFR 63, Subpart CCCCCC, the gasoline storage tank 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.)

### National Emission Standards for Hazardous Air Pollutants Requirements

#### E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.11130, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the gasoline fuel transfer dispensing operation as specified in Table 3 of 40 CFR Part 63, Subpart CCCCCC in accordance with the schedule in 40 CFR 63 Subpart CCCCCC

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

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

#### E.2.2 National Emissions Standards for Hazardous Air Pollutants for Source Category Gasoline Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment B), for the gasoline fuel transfer dispensing operation and gasoline storage tank:

- (1) 40 CFR 63.11110
- (2) 40 CFR 63.11111(a),(b),(e),(f),(g),(h),(i),(j), and (k)
- (3) 40 CFR 63.11112(a) and (b)
- (4) 40 CFR 63.11113(a) and (d)
- (5) 40 CFR 63.11115(a)
- (6) 40 CFR 63.11116
- (7) 40 CFR 63.11130
- (8) 40 CFR 63.11131
- (9) 40 CFR 63.11132
- (10) Table 3

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

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

Source Name: Dean Baldwin Painting, LP  
Source Address: 2075 North Hoosier Boulevard, Peru, Indiana 46971  
FESOP Permit No.: F103-30549-00046

**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: Dean Baldwin Painting, LP  
Source Address: 2075 North Hoosier Boulevard, Peru, Indiana 46971  
FESOP Permit No.: F103-30549-00046

**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> |
|--|

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <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**

**FESOP Quarterly Report**

Source Name: Dean Baldwin Painting, LP  
 Source Address: 2075 North Hoosier Boulevard, Peru, IN 46971  
 FESOP Permit No.: F103-30549-00046  
 Facilities: Aircraft Refinishing Operation (REFINISH)  
 Parameter: VOC  
 Limit: The total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, to the aircraft refinishing operation (REFINISH), minus the VOC containing waste materials shipped out, shall be limited to 97.30 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1			Column 2			Column 1 + Column 2		
	This Month			Previous 11 Months			12 Month Total		
	VOC Input (tons)	VOC Recycled (tons)	VOC Emitted (tons)	VOC Input (tons)	VOC Recycled (tons)	VOC Emitted (VOC)	VOC Input (tons)	VOC Recycled (tons)	VOC Emitted (tons)
Month									
Month									
Month									

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Dean Baldwin Painting, LP  
 Source Address: 2075 North Hoosier Boulevard, Peru, IN 46971  
 FESOP Permit No.: F103-30549-00046  
 Facilities: Aircraft Refinishing Operation (REFINISH)  
 Parameter: Single HAP  
 Limit: The total input of any single HAP, including coatings, dilution solvents, and cleaning solvents, to the aircraft refinishing operation (REFINISH), minus the amount of single HAP in waste shipped offsite, shall be limited to 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1			Column 2			Column 1 + Column 2		
	This Month			Previous 11 Months			12 Month Total		
	HAP Input (tons)	HAP Recycled (tons)	HAP Emitted (VOC)	HAP Input (tons)	HAP Recycled (tons)	HAP Emitted (VOC)	HAP Input (tons)	HAP Recycled (tons)	HAP Emitted (VOC)
Month									
Month									
Month									

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Dean Baldwin Painting, LP  
 Source Address: 2075 North Hoosier Boulevard, Peru, IN 46971  
 FESOP Permit No.: F103-30549-00046  
 Facilities: Aircraft Refinishing Operation (REFINISH)  
 Parameter: Combined HAPs  
 Limit: The total input of combined HAPs, including coatings, dilution solvents, and cleaning solvents, to the aircraft refinishing operation (REFINISH), minus the amount of combined HAPs in waste shipped offsite, shall be limited to 24.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1			Column 2			Column 1 + Column 2		
	This Month			Previous 11 Months			12 Month Total		
	HAPs Input (tons)	HAPs Recycled (tons)	HAPs Emitted (tons)	HAPs Input (tons)	HAPs Recycled (tons)	HAPs Emitted (VOC)	HAPs Input (tons)	HAPs Recycled (tons)	HAPs Emitted (VOC)
Month									
Month									
Month									

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 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: Dean Baldwin Painting, LP  
 Source Address: 2075 North Hoosier Boulevard, Peru, Indiana 46971  
 FESOP Permit No.: F103-30549-00046

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

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".	
<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: \_\_\_\_\_

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

Dean Baldwin Painting, LP  
2075 North Hoosier Boulevard  
Peru, Indiana 46971

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Dean Baldwin Painting, LP, 2075 North Hoosier Boulevard, Peru, Indiana 46971, completed construction of the aircraft refinishing facility on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on May 16, 2011 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F103-30549-00046, Plant ID No. 103-00046 issued on \_\_\_\_\_.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

**Attachment A**

**Title 40: Protection of Environment**

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

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

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

**What This Subpart Covers**

**§ 63.11169 What is the purpose of this subpart?**

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

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

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

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

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

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

(2) Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

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

(4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in §63.11180.

(5) Surface coating or paint stripping that meets the definition of “quality control activities” in §63.11180.

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

**§ 63.11170 Am I subject to this subpart?**

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

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

(2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

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

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

(a) This subpart applies to each new and existing affected area source engaged in the activities listed in §63.11170, with the exception of those activities listed in §63.11169(d) of this subpart.

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

(1) Mixing rooms and equipment;

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

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

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

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

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

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

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

(d) An affected source is reconstructed if it meets the definition of reconstruction in §63.2.

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

## **General Compliance Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign

outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

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

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

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

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

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

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

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

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

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

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained

from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

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

(5) As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

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

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

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

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

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

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

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

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

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

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

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

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

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

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

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

## **Notifications, Reports, and Records**

### **§ 63.11175 What notifications must I submit?**

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by §63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

(1) The company name, if applicable.

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

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

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

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

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

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

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

(7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g) of this subpart.

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

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

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

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d). For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g).

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

(4) If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with §63.11173(b).

### **§ 63.11176 What reports must I submit?**

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report

submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

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

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

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with §63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in §63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§63.11173(d) and 63.11177(f).

### **§ 63.11177 What records must I keep?**

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

(a) Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).

(d) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.

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

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

(g) Records of any deviation from the requirements in §§63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

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

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

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

### **Other Requirements and Information**

### **§ 63.11179 Who implements and enforces this subpart?**

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

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

(c) The authority in §63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

### **§ 63.11180 What definitions do I need to know?**

Terms used in this subpart are defined in the Clean Air Act, in 40 CFR 63.2, and in this section as follows:

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

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

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

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

*Appurtenance* means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed

mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

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

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

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

- (1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.
- (2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.
- (3) Adhesives, sealants, maskants, or caulking materials.
- (4) Temporary protective coatings, lubricants, or surface preparation materials.
- (5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*Non-HAP solvent* means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined

carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

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

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

*Painter* means any person who spray applies coating.

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

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

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

- (1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.
- (2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.
- (3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.
- (4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

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

- (1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.
- (2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.
- (3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

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

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

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

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

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

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

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

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

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

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

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

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

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.1(a)(1)–(12)	General Applicability	Yes	
§63.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in §63.11170.
§63.1(c)(1)	Applicability After Standard Established	Yes	

§63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.1(c)(5)	Notifications	Yes	
§63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.2	Definitions	Yes	Additional definitions are specified in §63.11180.
§63.3(a)–(c)	Units and Abbreviations	Yes	
§63.4(a)(1)–(5)	Prohibited Activities	Yes	
§63.4(b)–(c)	Circumvention/Fragmentation	Yes	
§63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§63.6(a)	Compliance With Standards and Maintenance Requirements— Applicability	Yes	
§63.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(e)(1)–(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§63.6(f)(2)–(3)	Methods for Determining Compliance	Yes	
§63.6(g)(1)–(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§63.6(i)(1)–(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.

§63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(a)–(d)	Notification Requirements	Yes	§63.11175 specifies notification requirements.
§63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(h)	Notification of Compliance Status	No	§63.11175 specifies the dates and required content for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	§63.11176(a) specifies the dates for submitting the notification of changes report.
§63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §63.11177.
§63.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.11176.
§63.10(d)(2)–(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions

			observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14.
§63.15	Availability of Information/Confidentiality	Yes	
§63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§63.16(b)–(c)	Performance Track Provisions—reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

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

**Attachment B**

**Title 40: Protection of Environment**

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

**Subpart CCCCCC—National Emission Standards for Hazardous Air Pollutants for Source Category:  
Gasoline Dispensing Facilities**

**Source:** 73 FR 1945, Jan. 10, 2008, unless otherwise noted.

**What This Subpart Covers**

**§ 63.11110 What is the purpose of this subpart?**

This subpart establishes national emission limitations and management practices for hazardous air pollutants (HAP) emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF). This subpart also establishes requirements to demonstrate compliance with the emission limitations and management practices.

**§ 63.11111 Am I subject to the requirements in this subpart?**

- (a) The affected source to which this subpart applies is each GDF that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank.
- (b) If your GDF has a monthly throughput of less than 10,000 gallons of gasoline, you must comply with the requirements in §63.11116.
- (c) If your GDF has a monthly throughput of 10,000 gallons of gasoline or more, you must comply with the requirements in §63.11117.
- (d) If your GDF has a monthly throughput of 100,000 gallons of gasoline or more, you must comply with the requirements in §63.11118.
- (e) An affected source shall, upon request by the Administrator, demonstrate that their monthly throughput is less than the 10,000-gallon or the 100,000-gallon threshold level, as applicable. For new or reconstructed affected sources, as specified in §63.11112(b) and (c), recordkeeping to document monthly throughput must begin upon startup of the affected source. For existing sources, as specified in §63.11112(d), recordkeeping to document monthly throughput must begin on January 10, 2008. For existing sources that are subject to this subpart only because they load gasoline into fuel tanks other than those in motor vehicles, as defined in §63.11132, recordkeeping to document monthly throughput must begin on January 24, 2011. Records required under this paragraph shall be kept for a period of 5 years.
- (f) If you are an owner or operator of affected sources, as defined in paragraph (a) of this section, you are not required to obtain a permit under 40 CFR part 70 or 40 CFR part 71 as a result of being subject to this subpart. However, you must still apply for and obtain a permit under 40 CFR part 70 or 40 CFR part 71 if you meet one or more of the applicability criteria found in 40 CFR 70.3(a) and (b) or 40 CFR 71.3(a) and (b).
- (g) The loading of aviation gasoline into storage tanks at airports, and the subsequent transfer of aviation gasoline within the airport, is not subject to this subpart.

(h) Monthly throughput is the total volume of gasoline loaded into, or dispensed from, all the gasoline storage tanks located at a single affected GDF. If an area source has two or more GDF at separate locations within the area source, each GDF is treated as a separate affected source.

(i) If your affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold.

(j) The dispensing of gasoline from a fixed gasoline storage tank at a GDF into a portable gasoline tank for the on-site delivery and subsequent dispensing of the gasoline into the fuel tank of a motor vehicle or other gasoline-fueled engine or equipment used within the area source is only subject to §63.11116 of this subpart.

(k) For any affected source subject to the provisions of this subpart and another Federal rule, you may elect to comply only with the more stringent provisions of the applicable subparts. You must consider all provisions of the rules, including monitoring, recordkeeping, and reporting. You must identify the affected source and provisions with which you will comply in your Notification of Compliance Status required under §63.11124. You also must demonstrate in your Notification of Compliance Status that each provision with which you will comply is at least as stringent as the otherwise applicable requirements in this subpart. You are responsible for making accurate determinations concerning the more stringent provisions, and noncompliance with this rule is not excused if it is later determined that your determination was in error, and, as a result, you are violating this subpart. Compliance with this rule is your responsibility and the Notification of Compliance Status does not alter or affect that responsibility.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4181, Jan. 24, 2011]

#### **§ 63.11112 What parts of my affected source does this subpart cover?**

(a) The emission sources to which this subpart applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at new, reconstructed, or existing GDF that meet the criteria specified in §63.11111. Pressure/Vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources. The equipment used for the refueling of motor vehicles is not covered by this subpart.

(b) An affected source is a new affected source if you commenced construction on the affected source after November 9, 2006, and you meet the applicability criteria in §63.11111 at the time you commenced operation.

(c) An affected source is reconstructed if you meet the criteria for reconstruction as defined in §63.2.

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

#### **§ 63.11113 When do I have to comply with this subpart?**

(a) If you have a new or reconstructed affected source, you must comply with this subpart according to paragraphs (a)(1) and (2) of this section, except as specified in paragraph (d) of this section.

(1) If you start up your affected source before January 10, 2008, you must comply with the standards in this subpart no later than January 10, 2008.

(2) If you start up your affected source after January 10, 2008, you must comply with the standards in this subpart upon startup of your affected source.

(b) If you have an existing affected source, you must comply with the standards in this subpart no later than January 10, 2011.

(c) If you have an existing affected source that becomes subject to the control requirements in this subpart because of an increase in the monthly throughput, as specified in §63.11111(c) or §63.11111(d), you must comply with the standards in this subpart no later than 3 years after the affected source becomes subject to the control requirements in this subpart.

(d) If you have a new or reconstructed affected source and you are complying with Table 1 to this subpart, you must comply according to paragraphs (d)(1) and (2) of this section.

(1) If you start up your affected source from November 9, 2006 to September 23, 2008, you must comply no later than September 23, 2008.

(2) If you start up your affected source after September 23, 2008, you must comply upon startup of your affected source.

(e) The initial compliance demonstration test required under §63.11120(a)(1) and (2) must be conducted as specified in paragraphs (e)(1) and (2) of this section.

(1) If you have a new or reconstructed affected source, you must conduct the initial compliance test upon installation of the complete vapor balance system.

(2) If you have an existing affected source, you must conduct the initial compliance test as specified in paragraphs (e)(2)(i) or (e)(2)(ii) of this section.

(i) For vapor balance systems installed on or before December 15, 2009, you must test no later than 180 days after the applicable compliance date specified in paragraphs (b) or (c) of this section.

(ii) For vapor balance systems installed after December 15, 2009, you must test upon installation of the complete vapor balance system.

(f) If your GDF is subject to the control requirements in this subpart only because it loads gasoline into fuel tanks other than those in motor vehicles, as defined in §63.11132, you must comply with the standards in this subpart as specified in paragraphs (f)(1) or (f)(2) of this section.

(1) If your GDF is an existing facility, you must comply by January 24, 2014.

(2) If your GDF is a new or reconstructed facility, you must comply by the dates specified in paragraphs (f)(2)(i) and (ii) of this section.

(i) If you start up your GDF after December 15, 2009, but before January 24, 2011, you must comply no later than January 24, 2011.

(ii) If you start up your GDF after January 24, 2011, you must comply upon startup of your GDF.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 35944, June 25, 2008; 76 FR 4181, Jan. 24, 2011]

## **Emission Limitations and Management Practices**

### **§ 63.11115 What are my general duties to minimize emissions?**

Each owner or operator of an affected source under this subpart must comply with the requirements of paragraphs (a) and (b) of this section.

(a) You must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(b) You must keep applicable records and submit reports as specified in §63.11125(d) and §63.11126(b).

[76 FR 4182, Jan. 24, 2011]

**§ 63.11116 Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline.**

(a) You must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

- (1) Minimize gasoline spills;
- (2) Clean up spills as expeditiously as practicable;
- (3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
- (4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

(b) You are not required to submit notifications or reports as specified in §63.11125, §63.11126, or subpart A of this part, but you must have records available within 24 hours of a request by the Administrator to document your gasoline throughput.

(c) You must comply with the requirements of this subpart by the applicable dates specified in §63.11113.

(d) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (a)(3) of this section.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4182, Jan. 24, 2011]

**§ 63.11117 Requirements for facilities with monthly throughput of 10,000 gallons of gasoline or more.**

(a) You must comply with the requirements in section §63.11116(a).

(b) Except as specified in paragraph (c) of this section, you must only load gasoline into storage tanks at your facility by utilizing submerged filling, as defined in §63.11132, and as specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section. The applicable distances in paragraphs (b)(1) and (2) shall be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank.

(1) Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank.

(2) Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the tank.

(3) Submerged fill pipes not meeting the specifications of paragraphs (b)(1) or (b)(2) of this section are allowed if the owner or operator can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by the Administrator's delegated representative during the course of a site visit.

(c) Gasoline storage tanks with a capacity of less than 250 gallons are not required to comply with the submerged fill requirements in paragraph (b) of this section, but must comply only with all of the requirements in §63.11116.

(d) You must have records available within 24 hours of a request by the Administrator to document your gasoline throughput.

(e) You must submit the applicable notifications as required under §63.11124(a).

(f) You must comply with the requirements of this subpart by the applicable dates contained in §63.11113.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 12276, Mar. 7, 2008; 76 FR 4182, Jan. 24, 2011]

**§ 63.11118 Requirements for facilities with monthly throughput of 100,000 gallons of gasoline or more.**

(a) You must comply with the requirements in §§63.11116(a) and 63.11117(b).

(b) Except as provided in paragraph (c) of this section, you must meet the requirements in either paragraph (b)(1) or paragraph (b)(2) of this section.

(1) Each management practice in Table 1 to this subpart that applies to your GDF.

(2) If, prior to January 10, 2008, you satisfy the requirements in both paragraphs (b)(2)(i) and (ii) of this section, you will be deemed in compliance with this subsection.

(i) You operate a vapor balance system at your GDF that meets the requirements of either paragraph (b)(2)(i)(A) or paragraph (b)(2)(i)(B) of this section.

(A) Achieves emissions reduction of at least 90 percent.

(B) Operates using management practices at least as stringent as those in Table 1 to this subpart.

(ii) Your gasoline dispensing facility is in compliance with an enforceable State, local, or tribal rule or permit that contains requirements of either paragraph (b)(2)(i)(A) or paragraph (b)(2)(i)(B) of this section.

(c) The emission sources listed in paragraphs (c)(1) through (3) of this section are not required to comply with the control requirements in paragraph (b) of this section, but must comply with the requirements in §63.11117.

(1) Gasoline storage tanks with a capacity of less than 250 gallons that are constructed after January 10, 2008.

(2) Gasoline storage tanks with a capacity of less than 2,000 gallons that were constructed before January 10, 2008.

(3) Gasoline storage tanks equipped with floating roofs, or the equivalent.

(d) Cargo tanks unloading at GDF must comply with the management practices in Table 2 to this subpart.

(e) You must comply with the applicable testing requirements contained in §63.11120.

(f) You must submit the applicable notifications as required under §63.11124.

(g) You must keep records and submit reports as specified in §§63.11125 and 63.11126.

(h) You must comply with the requirements of this subpart by the applicable dates contained in §63.11113.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 12276, Mar. 7, 2008]

## Testing and Monitoring Requirements

### § 63.11120 What testing and monitoring requirements must I meet?

(a) Each owner or operator, at the time of installation, as specified in §63.11113(e), of a vapor balance system required under §63.11118(b)(1), and every 3 years thereafter, must comply with the requirements in paragraphs (a)(1) and (2) of this section.

(1) You must demonstrate compliance with the leak rate and cracking pressure requirements, specified in item 1(g) of Table 1 to this subpart, for pressure-vacuum vent valves installed on your gasoline storage tanks using the test methods identified in paragraph (a)(1)(i) or paragraph (a)(1)(ii) of this section.

(i) California Air Resources Board Vapor Recovery Test Procedure TP-201.1E,—Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves, adopted October 8, 2003 (incorporated by reference, see §63.14).

(ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f).

(2) You must demonstrate compliance with the static pressure performance requirement specified in item 1(h) of Table 1 to this subpart for your vapor balance system by conducting a static pressure test on your gasoline storage tanks using the test methods identified in paragraphs (a)(2)(i), (a)(2)(ii), or (a)(2)(iii) of this section.

(i) California Air Resources Board Vapor Recovery Test Procedure TP-201.3,—Determination of 2-Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities, adopted April 12, 1996, and amended March 17, 1999 (incorporated by reference, see §63.14).

(ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f).

(iii) Bay Area Air Quality Management District Source Test Procedure ST-30—Static Pressure Integrity Test—Underground Storage Tanks, adopted November 30, 1983, and amended December 21, 1994 (incorporated by reference, see §63.14).

(b) Each owner or operator choosing, under the provisions of §63.6(g), to use a vapor balance system other than that described in Table 1 to this subpart must demonstrate to the Administrator or delegated authority under paragraph §63.11131(a) of this subpart, the equivalency of their vapor balance system to that described in Table 1 to this subpart using the procedures specified in paragraphs (b)(1) through (3) of this section.

(1) You must demonstrate initial compliance by conducting an initial performance test on the vapor balance system to demonstrate that the vapor balance system achieves 95 percent reduction using the California Air Resources Board Vapor Recovery Test Procedure TP-201.1,—Volumetric Efficiency for Phase I Vapor Recovery Systems, adopted April 12, 1996, and amended February 1, 2001, and October 8, 2003, (incorporated by reference, see §63.14).

(2) You must, during the initial performance test required under paragraph (b)(1) of this section, determine and document alternative acceptable values for the leak rate and cracking pressure requirements specified in item 1(g) of Table 1 to this subpart and for the static pressure performance requirement in item 1(h) of Table 1 to this subpart.

(3) You must comply with the testing requirements specified in paragraph (a) of this section.

(c) Conduct of performance tests. Performance tests conducted for this subpart shall be conducted under such conditions as the Administrator specifies to the owner or operator based on representative performance ( *i.e.*, performance based on normal operating conditions) of the affected source. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests.

(d) Owners and operators of gasoline cargo tanks subject to the provisions of Table 2 to this subpart must conduct annual certification testing according to the vapor tightness testing requirements found in §63.11092(f).

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4182, Jan. 24, 2011]

## **Notifications, Records, and Reports**

### **§ 63.11124 What notifications must I submit and when?**

(a) Each owner or operator subject to the control requirements in §63.11117 must comply with paragraphs (a)(1) through (3) of this section.

(1) You must submit an Initial Notification that you are subject to this subpart by May 9, 2008, or at the time you become subject to the control requirements in §63.11117, unless you meet the requirements in paragraph (a)(3) of this section. If your affected source is subject to the control requirements in §63.11117 only because it loads gasoline into fuel tanks other than those in motor vehicles, as defined in §63.11132, you must submit the Initial Notification by May 24, 2011. The Initial Notification must contain the information specified in paragraphs (a)(1)(i) through (iii) of this section. The notification must be submitted to the applicable EPA Regional Office and delegated State authority as specified in §63.13.

(i) The name and address of the owner and the operator.

(ii) The address (i.e., physical location) of the GDF.

(iii) A statement that the notification is being submitted in response to this subpart and identifying the requirements in paragraphs (a) through (c) of §63.11117 that apply to you.

(2) You must submit a Notification of Compliance Status to the applicable EPA Regional Office and the delegated State authority, as specified in §63.13, within 60 days of the applicable compliance date specified in §63.11113, unless you meet the requirements in paragraph (a)(3) of this section. The Notification of Compliance Status must be signed by a responsible official who must certify its accuracy, must indicate whether the source has complied with the requirements of this subpart, and must indicate whether the facilities' monthly throughput is calculated based on the volume of gasoline loaded into all storage tanks or on the volume of gasoline dispensed from all storage tanks. If your facility is in compliance with the requirements of this subpart at the time the Initial Notification required under paragraph (a)(1) of this section is due, the Notification of Compliance Status may be submitted in lieu of the Initial Notification provided it contains the information required under paragraph (a)(1) of this section.

(3) If, prior to January 10, 2008, you are operating in compliance with an enforceable State, local, or tribal rule or permit that requires submerged fill as specified in §63.11117(b), you are not required to submit an Initial Notification or a Notification of Compliance Status under paragraph (a)(1) or paragraph (a)(2) of this section.

(b) Each owner or operator subject to the control requirements in §63.11118 must comply with paragraphs (b)(1) through (5) of this section.

(1) You must submit an Initial Notification that you are subject to this subpart by May 9, 2008, or at the time you become subject to the control requirements in §63.11118. If your affected source is subject to the control requirements in §63.11118 only because it loads gasoline into fuel tanks other than those in motor vehicles, as defined in §63.11132, you must submit the Initial Notification by May 24, 2011. The Initial Notification must contain the information specified in paragraphs (b)(1)(i) through (iii) of this section. The notification must be submitted to the applicable EPA Regional Office and delegated State authority as specified in §63.13.

(i) The name and address of the owner and the operator.

(ii) The address (i.e., physical location) of the GDF.

(iii) A statement that the notification is being submitted in response to this subpart and identifying the requirements in paragraphs (a) through (c) of §63.11118 that apply to you.

(2) You must submit a Notification of Compliance Status to the applicable EPA Regional Office and the delegated State authority, as specified in §63.13, in accordance with the schedule specified in §63.9(h). The Notification of Compliance

Status must be signed by a responsible official who must certify its accuracy, must indicate whether the source has complied with the requirements of this subpart, and must indicate whether the facility's throughput is determined based on the volume of gasoline loaded into all storage tanks or on the volume of gasoline dispensed from all storage tanks. If your facility is in compliance with the requirements of this subpart at the time the Initial Notification required under paragraph (b)(1) of this section is due, the Notification of Compliance Status may be submitted in lieu of the Initial Notification provided it contains the information required under paragraph (b)(1) of this section.

(3) If, prior to January 10, 2008, you satisfy the requirements in both paragraphs (b)(3)(i) and (ii) of this section, you are not required to submit an Initial Notification or a Notification of Compliance Status under paragraph (b)(1) or paragraph (b)(2) of this subsection.

(i) You operate a vapor balance system at your gasoline dispensing facility that meets the requirements of either paragraphs (b)(3)(i)(A) or (b)(3)(i)(B) of this section.

(A) Achieves emissions reduction of at least 90 percent.

(B) Operates using management practices at least as stringent as those in Table 1 to this subpart.

(ii) Your gasoline dispensing facility is in compliance with an enforceable State, local, or tribal rule or permit that contains requirements of either paragraphs (b)(3)(i)(A) or (b)(3)(i)(B) of this section.

(4) You must submit a Notification of Performance Test, as specified in §63.9(e), prior to initiating testing required by §63.11120(a) and (b).

(5) You must submit additional notifications specified in §63.9, as applicable.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 12276, Mar. 7, 2008; 76 FR 4182, Jan. 24, 2011]

### **§ 63.11125 What are my recordkeeping requirements?**

(a) Each owner or operator subject to the management practices in §63.11118 must keep records of all tests performed under §63.11120(a) and (b).

(b) Records required under paragraph (a) of this section shall be kept for a period of 5 years and shall be made available for inspection by the Administrator's delegated representatives during the course of a site visit.

(c) Each owner or operator of a gasoline cargo tank subject to the management practices in Table 2 to this subpart must keep records documenting vapor tightness testing for a period of 5 years. Documentation must include each of the items specified in §63.11094(b)(2)(i) through (viii). Records of vapor tightness testing must be retained as specified in either paragraph (c)(1) or paragraph (c)(2) of this section.

(1) The owner or operator must keep all vapor tightness testing records with the cargo tank.

(2) As an alternative to keeping all records with the cargo tank, the owner or operator may comply with the requirements of paragraphs (c)(2)(i) and (ii) of this section.

(i) The owner or operator may keep records of only the most recent vapor tightness test with the cargo tank, and keep records for the previous 4 years at their office or another central location.

(ii) Vapor tightness testing records that are kept at a location other than with the cargo tank must be instantly available (e.g., via e-mail or facsimile) to the Administrator's delegated representative during the course of a site visit or within a mutually agreeable time frame. Such records must be an exact duplicate image of the original paper copy record with certifying signatures.

(d) Each owner or operator of an affected source under this subpart shall keep records as specified in paragraphs (d)(1) and (2) of this section.

(1) Records of the occurrence and duration of each malfunction of operation ( *i.e.*, process equipment) or the air pollution control and monitoring equipment.

(2) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4183, Jan. 24, 2011]

### **§ 63.11126 What are my reporting requirements?**

(a) Each owner or operator subject to the management practices in §63.11118 shall report to the Administrator the results of all volumetric efficiency tests required under §63.11120(b). Reports submitted under this paragraph must be submitted within 180 days of the completion of the performance testing.

(b) Each owner or operator of an affected source under this subpart shall report, by March 15 of each year, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred.

[76 FR 4183, Jan. 24, 2011]

### **Other Requirements and Information**

#### **§ 63.11130 What parts of the General Provisions apply to me?**

Table 3 to this subpart shows which parts of the General Provisions apply to you.

#### **§ 63.11131 Who implements and enforces this subpart?**

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

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

(c) The authorities that cannot be delegated to State, local, or tribal agencies are as specified in paragraphs (c)(1) through (3) of this section.

(1) Approval of alternatives to the requirements in §§63.11116 through 63.11118 and 63.11120.

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart.

(3) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.

### **§ 63.11132 What definitions apply to this subpart?**

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act (CAA), or in subparts A and BBBB of this part. For purposes of this subpart, definitions in this section supersede definitions in other parts or subparts.

*Dual-point vapor balance system* means a type of vapor balance system in which the storage tank is equipped with an entry port for a gasoline fill pipe and a separate exit port for a vapor connection.

*Gasoline* means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater, which is used as a fuel for internal combustion engines.

*Gasoline cargo tank* means a delivery tank truck or railcar which is loading or unloading gasoline, or which has loaded or unloaded gasoline on the immediately previous load.

*Gasoline dispensing facility (GDF)* means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment.

*Monthly throughput* means the total volume of gasoline that is loaded into, or dispensed from, all gasoline storage tanks at each GDF during a month. Monthly throughput is calculated by summing the volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the current day, plus the total volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the previous 364 days, and then dividing that sum by 12.

*Motor vehicle* means any self-propelled vehicle designed for transporting persons or property on a street or highway.

*Nonroad engine* means an internal combustion engine (including the fuel system) that is not used in a motor vehicle or a vehicle used solely for competition, or that is not subject to standards promulgated under section 7411 of this title or section 7521 of this title.

*Nonroad vehicle* means a vehicle that is powered by a nonroad engine, and that is not a motor vehicle or a vehicle used solely for competition.

*Submerged filling* means, for the purposes of this subpart, the filling of a gasoline storage tank through a submerged fill pipe whose discharge is no more than the applicable distance specified in §63.11117(b) from the bottom of the tank. Bottom filling of gasoline storage tanks is included in this definition.

*Vapor balance system* means a combination of pipes and hoses that create a closed system between the vapor spaces of an unloading gasoline cargo tank and a receiving storage tank such that vapors displaced from the storage tank are transferred to the gasoline cargo tank being unloaded.

*Vapor-tight* means equipment that allows no loss of vapors. Compliance with vapor-tight requirements can be determined by checking to ensure that the concentration at a potential leak source is not equal to or greater than 100 percent of the Lower Explosive Limit when measured with a combustible gas detector, calibrated with propane, at a distance of 1 inch from the source.

*Vapor-tight gasoline cargo tank* means a gasoline cargo tank which has demonstrated within the 12 preceding months that it meets the annual certification test requirements in §63.11092(f) of this part.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4183, Jan. 24, 2011]

**Table 1 to Subpart CCCCC of Part 63—Applicability Criteria and Management Practices for Gasoline Dispensing Facilities With Monthly Throughput of 100,000 Gallons of Gasoline or More<sup>1</sup>**

If you own or operate	Then you must
1. A new, reconstructed, or existing GDF subject to §63.11118	Install and operate a vapor balance system on your gasoline storage tanks that meets the design criteria in paragraphs (a) through (h).
	(a) All vapor connections and lines on the storage tank shall be equipped with closures that seal upon disconnect.
	(b) The vapor line from the gasoline storage tank to the gasoline cargo tank shall be vapor-tight, as defined in §63.11132.
	(c) The vapor balance system shall be designed such that the pressure in the tank truck does not exceed 18 inches water pressure or 5.9 inches water vacuum during product transfer.
	(d) The vapor recovery and product adaptors, and the method of connection with the delivery elbow, shall be designed so as to prevent the over-tightening or loosening of fittings during normal delivery operations.
	(e) If a gauge well separate from the fill tube is used, it shall be provided with a submerged drop tube that extends the same distance from the bottom of the storage tank as specified in §63.11117(b).
	(f) Liquid fill connections for all systems shall be equipped with vapor-tight caps.
	(g) Pressure/vacuum (PV) vent valves shall be installed on the storage tank vent pipes. The pressure specifications for PV vent valves shall be: a positive pressure setting of 2.5 to 6.0 inches of water and a negative pressure setting of 6.0 to 10.0 inches of water. The total leak rate of all PV vent valves at an affected facility, including connections, shall not exceed 0.17 cubic foot per hour at a pressure of 2.0 inches of water and 0.63 cubic foot per hour at a vacuum of 4 inches of water.
	(h) The vapor balance system shall be capable of meeting the static pressure performance requirement of the following equation:
	$P_f = 2e^{-500.887/v}$
	Where:
	$P_f$ = Minimum allowable final pressure, inches of water.
	$v$ = Total ullage affected by the test, gallons.
	$e$ = Dimensionless constant equal to approximately 2.718.
	$2$ = The initial pressure, inches water.
2. A new or reconstructed GDF, or any storage tank(s) constructed after November 9, 2006, at an existing affected facility subject to §63.11118	Equip your gasoline storage tanks with a dual-point vapor balance system, as defined in §63.11132, and comply with the requirements of item 1 in this Table.

<sup>1</sup>The management practices specified in this Table are not applicable if you are complying with the requirements in §63.11118(b)(2), except that if you are complying with the requirements in §63.11118(b)(2)(i)(B), you must operate using management practices at least as stringent as those listed in this Table.

**Table 2 to Subpart CCCCC of Part 63—Applicability Criteria and Management Practices for Gasoline Cargo Tanks Unloading at Gasoline Dispensing Facilities With Monthly Throughput of 100,000 Gallons of Gasoline or More**

If you own or operate	Then you must
A gasoline cargo tank	Not unload gasoline into a storage tank at a GDF subject to the control requirements in this subpart unless the following conditions are met:
	(i) All hoses in the vapor balance system are properly connected,
	(ii) The adapters or couplers that attach to the vapor line on the storage tank have closures that seal upon disconnect,
	(iii) All vapor return hoses, couplers, and adapters used in the gasoline delivery are vapor-tight,
	(iv) All tank truck vapor return equipment is compatible in size and forms a vapor-tight connection with the vapor balance equipment on the GDF storage tank, and
	(v) All hatches on the tank truck are closed and securely fastened.
	(vi) The filling of storage tanks at GDF shall be limited to unloading from vapor-tight gasoline cargo tanks. Documentation that the cargo tank has met the specifications of EPA Method 27 shall be carried with the cargo tank, as specified in §63.11125(c).

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4184, Jan. 24, 2011]

**Table 3 to Subpart CCCCC of Part 63—Applicability of General Provisions**

Citation	Subject	Brief description	Applies to subpart CCCCC
§63.1	Applicability	Initial applicability determination; applicability after standard established; permit requirements; extensions, notifications	Yes, specific requirements given in §63.11111.
§63.1(c)(2)	Title V Permit	Requirements for obtaining a title V permit from the applicable permitting authority	Yes, §63.11111(f) of subpart CCCCC exempts identified area sources from the obligation to obtain title V operating permits.
§63.2	Definitions	Definitions for part 63 standards	Yes, additional definitions in §63.11132.
§63.3	Units and Abbreviations	Units and abbreviations for part 63 standards	Yes.
§63.4	Prohibited Activities and Circumvention	Prohibited activities; Circumvention, severability	Yes.
§63.5	Construction/Reconstruction	Applicability; applications; approvals	Yes, except that these notifications are not required for facilities subject to §63.11116.
§63.6(a)	Compliance with Standards/Operation & Maintenance—Applicability	General Provisions apply unless compliance extension; General Provisions apply to area sources that become major	Yes.

§63.6(b)(1)–(4)	Compliance Dates for New and Reconstructed Sources	Standards apply at effective date; 3 years after effective date; upon startup; 10 years after construction or reconstruction commences for CAA section 112(f)	Yes.
§63.6(b)(5)	Notification	Must notify if commenced construction or reconstruction after proposal	Yes.
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance Dates for New and Reconstructed Area Sources That Become Major	Area sources that become major must comply with major source standards immediately upon becoming major, regardless of whether required to comply when they were an area source	No.
§63.6(c)(1)–(2)	Compliance Dates for Existing Sources	Comply according to date in this subpart, which must be no later than 3 years after effective date; for CAA section 112(f) standards, comply within 90 days of effective date unless compliance extension	No, §63.11113 specifies the compliance dates.
§63.6(c)(3)–(4)	[Reserved]		
§63.6(c)(5)	Compliance Dates for Existing Area Sources That Become Major	Area sources That become major must comply with major source standards by date indicated in this subpart or by equivalent time period (e.g., 3 years)	No.
§63.6(d)	[Reserved]		
63.6(e)(1)(i)	General duty to minimize emissions	Operate to minimize emissions at all times; information Administrator will use to determine if operation and maintenance requirements were met.	No. See §63.11115 for general duty requirement.
63.6(e)(1)(ii)	Requirement to correct malfunctions ASAP	Owner or operator must correct malfunctions as soon as possible.	No.
§63.6(e)(2)	[Reserved]		
§63.6(e)(3)	Startup, Shutdown, and Malfunction (SSM) Plan	Requirement for SSM plan; content of SSM plan; actions during SSM	No.
§63.6(f)(1)	Compliance Except During SSM	You must comply with emission standards at all times except during SSM	No.
§63.6(f)(2)–(3)	Methods for Determining Compliance	Compliance based on performance test, operation and maintenance plans, records, inspection	Yes.
§63.6(g)(1)–(3)	Alternative Standard	Procedures for getting an alternative standard	Yes.
§63.6(h)(1)	Compliance with Opacity/Visible Emission (VE) Standards	You must comply with opacity/VE standards at all times except during SSM	No.
§63.6(h)(2)(i)	Determining Compliance with Opacity/VE Standards	If standard does not State test method, use EPA Method 9 for opacity in appendix A of part 60 of this chapter and EPA Method 22 for VE in appendix A of part 60 of this chapter	No.
§63.6(h)(2)(ii)	[Reserved]		
§63.6(h)(2)(iii)	Using Previous Tests To Demonstrate Compliance With Opacity/VE Standards	Criteria for when previous opacity/VE testing can be used to show compliance with this subpart	No.
§63.6(h)(3)	[Reserved]		

§63.6(h)(4)	Notification of Opacity/VE Observation Date	Must notify Administrator of anticipated date of observation	No.
§63.6(h)(5)(i), (iii)–(v)	Conducting Opacity/VE Observations	Dates and schedule for conducting opacity/VE observations	No.
§63.6(h)(5)(ii)	Opacity Test Duration and Averaging Times	Must have at least 3 hours of observation with 30 6-minute averages	No.
§63.6(h)(6)	Records of Conditions During Opacity/VE Observations	Must keep records available and allow Administrator to inspect	No.
§63.6(h)(7)(i)	Report Continuous Opacity Monitoring System (COMS) Monitoring Data From Performance Test	Must submit COMS data with other performance test data	No.
§63.6(h)(7)(ii)	Using COMS Instead of EPA Method 9	Can submit COMS data instead of EPA Method 9 results even if rule requires EPA Method 9 in appendix A of part 60 of this chapter, but must notify Administrator before performance test	No.
§63.6(h)(7)(iii)	Averaging Time for COMS During Performance Test	To determine compliance, must reduce COMS data to 6-minute averages	No.
§63.6(h)(7)(iv)	COMS Requirements	Owner/operator must demonstrate that COMS performance evaluations are conducted according to §63.8(e); COMS are properly maintained and operated according to §63.8(c) and data quality as §63.8(d)	No.
§63.6(h)(7)(v)	Determining Compliance with Opacity/VE Standards	COMS is probable but not conclusive evidence of compliance with opacity standard, even if EPA Method 9 observation shows otherwise. Requirements for COMS to be probable evidence-proper maintenance, meeting Performance Specification 1 in appendix B of part 60 of this chapter, and data have not been altered	No.
§63.6(h)(8)	Determining Compliance with Opacity/VE Standards	Administrator will use all COMS, EPA Method 9 (in appendix A of part 60 of this chapter), and EPA Method 22 (in appendix A of part 60 of this chapter) results, as well as information about operation and maintenance to determine compliance	No.
§63.6(h)(9)	Adjusted Opacity Standard	Procedures for Administrator to adjust an opacity standard	No.
§63.6(i)(1)–(14)	Compliance Extension	Procedures and criteria for Administrator to grant compliance extension	Yes.
§63.6(j)	Presidential Compliance Exemption	President may exempt any source from requirement to comply with this subpart	Yes.
§63.7(a)(2)	Performance Test Dates	Dates for conducting initial performance testing; must conduct 180 days after compliance date	Yes.
§63.7(a)(3)	CAA Section 114 Authority	Administrator may require a performance test under CAA section 114 at any time	Yes.
§63.7(b)(1)	Notification of Performance Test	Must notify Administrator 60 days before the test	Yes.
§63.7(b)(2)	Notification of Re-scheduling	If have to reschedule performance test, must	Yes.

		notify Administrator of rescheduled date as soon as practicable and without delay	
§63.7(c)	Quality Assurance (QA)/Test Plan	Requirement to submit site-specific test plan 60 days before the test or on date Administrator agrees with; test plan approval procedures; performance audit requirements; internal and external QA procedures for testing	Yes.
§63.7(d)	Testing Facilities	Requirements for testing facilities	Yes.
63.7(e)(1)	Conditions for Conducting Performance Tests	Performance test must be conducted under representative conditions	No, §63.11120(c) specifies conditions for conducting performance tests.
§63.7(e)(2)	Conditions for Conducting Performance Tests	Must conduct according to this subpart and EPA test methods unless Administrator approves alternative	Yes.
§63.7(e)(3)	Test Run Duration	Must have three test runs of at least 1 hour each; compliance is based on arithmetic mean of three runs; conditions when data from an additional test run can be used	Yes.
§63.7(f)	Alternative Test Method	Procedures by which Administrator can grant approval to use an intermediate or major change, or alternative to a test method	Yes.
§63.7(g)	Performance Test Data Analysis	Must include raw data in performance test report; must submit performance test data 60 days after end of test with the Notification of Compliance Status; keep data for 5 years	Yes.
§63.7(h)	Waiver of Tests	Procedures for Administrator to waive performance test	Yes.
§63.8(a)(1)	Applicability of Monitoring Requirements	Subject to all monitoring requirements in standard	Yes.
§63.8(a)(2)	Performance Specifications	Performance Specifications in appendix B of 40 CFR part 60 apply	Yes.
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring of Flares	Monitoring requirements for flares in §63.11 apply	Yes.
§63.8(b)(1)	Monitoring	Must conduct monitoring according to standard unless Administrator approves alternative	Yes.
§63.8(b)(2)–(3)	Multiple Effluents and Multiple Monitoring Systems	Specific requirements for installing monitoring systems; must install on each affected source or after combined with another affected source before it is released to the atmosphere provided the monitoring is sufficient to demonstrate compliance with the standard; if more than one monitoring system on an emission point, must report all monitoring system results, unless one monitoring system is a backup	No.
§63.8(c)(1)	Monitoring System Operation and Maintenance	Maintain monitoring system in a manner consistent with good air pollution control practices	No.
§63.8(c)(1)(i)–	Operation and Maintenance of	Must maintain and operate each CMS as	No.

(iii)	Continuous Monitoring Systems (CMS)	specified in §63.6(e)(1); must keep parts for routine repairs readily available; must develop a written SSM plan for CMS, as specified in §63.6(e)(3)	
§63.8(c)(2)–(8)	CMS Requirements	Must install to get representative emission or parameter measurements; must verify operational status before or at performance test	No.
§63.8(d)	CMS Quality Control	Requirements for CMS quality control, including calibration, etc.; must keep quality control plan on record for 5 years; keep old versions for 5 years after revisions	No.
§63.8(e)	CMS Performance Evaluation	Notification, performance evaluation test plan, reports	No.
§63.8(f)(1)–(5)	Alternative Monitoring Method	Procedures for Administrator to approve alternative monitoring	No.
§63.8(f)(6)	Alternative to Relative Accuracy Test	Procedures for Administrator to approve alternative relative accuracy tests for continuous emissions monitoring system (CEMS)	No.
§63.8(g)	Data Reduction	COMS 6-minute averages calculated over at least 36 evenly spaced data points; CEMS 1 hour averages computed over at least 4 equally spaced data points; data that cannot be used in average	No.
§63.9(a)	Notification Requirements	Applicability and State delegation	Yes.
§63.9(b)(1)–(2), (4)–(5)	Initial Notifications	Submit notification within 120 days after effective date; notification of intent to construct/reconstruct, notification of commencement of construction/reconstruction, notification of startup; contents of each	Yes.
§63.9(c)	Request for Compliance Extension	Can request if cannot comply by date or if installed best available control technology or lowest achievable emission rate	Yes.
§63.9(d)	Notification of Special Compliance Requirements for New Sources	For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date	Yes.
§63.9(e)	Notification of Performance Test	Notify Administrator 60 days prior	Yes.
§63.9(f)	Notification of VE/Opacity Test	Notify Administrator 30 days prior	No.
§63.9(g)	Additional Notifications when Using CMS	Notification of performance evaluation; notification about use of COMS data; notification that exceeded criterion for relative accuracy alternative	Yes, however, there are no opacity standards.
§63.9(h)(1)–(6)	Notification of Compliance Status	Contents due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority	Yes, however, there are no opacity standards.
§63.9(i)	Adjustment of Submittal Deadlines	Procedures for Administrator to approve change when notifications must be submitted	Yes.
§63.9(j)	Change in Previous Information	Must submit within 15 days after the change	Yes.

§63.10(a)	Recordkeeping/Reporting	Applies to all, unless compliance extension; when to submit to Federal vs. State authority; procedures for owners of more than one source	Yes.
§63.10(b)(1)	Recordkeeping/Reporting	General requirements; keep all records readily available; keep for 5 years	Yes.
§63.10(b)(2)(i)	Records related to SSM	Recordkeeping of occurrence and duration of startups and shutdowns	No.
§63.10(b)(2)(ii)	Records related to SSM	Recordkeeping of malfunctions	No. See §63.11125(d) for recordkeeping of (1) occurrence and duration and (2) actions taken during malfunction.
§63.10(b)(2)(iii)	Maintenance records	Recordkeeping of maintenance on air pollution control and monitoring equipment	Yes.
§63.10(b)(2)(iv)	Records Related to SSM	Actions taken to minimize emissions during SSM	No.
§63.10(b)(2)(v)	Records Related to SSM	Actions taken to minimize emissions during SSM	No.
§63.10(b)(2)(vi)–(xi)	CMS Records	Malfunctions, inoperative, out-of-control periods	No.
§63.10(b)(2)(xii)	Records	Records when under waiver	Yes.
§63.10(b)(2)(xiii)	Records	Records when using alternative to relative accuracy test	Yes.
§63.10(b)(2)(xiv)	Records	All documentation supporting Initial Notification and Notification of Compliance Status	Yes.
§63.10(b)(3)	Records	Applicability determinations	Yes.
§63.10(c)	Records	Additional records for CMS	No.
§63.10(d)(1)	General Reporting Requirements	Requirement to report	Yes.
§63.10(d)(2)	Report of Performance Test Results	When to submit to Federal or State authority	Yes.
§63.10(d)(3)	Reporting Opacity or VE Observations	What to report and when	No.
§63.10(d)(4)	Progress Reports	Must submit progress reports on schedule if under compliance extension	Yes.
§63.10(d)(5)	SSM Reports	Contents and submission	No. See §63.11126(b) for malfunction reporting requirements.
§63.10(e)(1)–(2)	Additional CMS Reports	Must report results for each CEMS on a unit; written copy of CMS performance evaluation; two-three copies of COMS performance evaluation	No.
§63.10(e)(3)(i)–(iii)	Reports	Schedule for reporting excess emissions	No.

§63.10(e)(3)(iv)–(v)	Excess Emissions Reports	Requirement to revert to quarterly submission if there is an excess emissions and parameter monitor exceedances (now defined as deviations); provision to request semiannual reporting after compliance for 1 year; submit report by 30th day following end of quarter or calendar half; if there has not been an exceedance or excess emissions (now defined as deviations), report contents in a statement that there have been no deviations; must submit report containing all of the information in §§63.8(c)(7)–(8) and 63.10(c)(5)–(13)	No.
§63.10(e)(3)(iv)–(v)	Excess Emissions Reports	Requirement to revert to quarterly submission if there is an excess emissions and parameter monitor exceedances (now defined as deviations); provision to request semiannual reporting after compliance for 1 year; submit report by 30th day following end of quarter or calendar half; if there has not been an exceedance or excess emissions (now defined as deviations), report contents in a statement that there have been no deviations; must submit report containing all of the information in §§63.8(c)(7)–(8) and 63.10(c)(5)–(13)	No, §63.11130(K) specifies excess emission events for this subpart.
§63.10(e)(3)(vi)–(viii)	Excess Emissions Report and Summary Report	Requirements for reporting excess emissions for CMS; requires all of the information in §§63.10(c)(5)–(13) and 63.8(c)(7)–(8)	No.
§63.10(e)(4)	Reporting COMS Data	Must submit COMS data with performance test data	No.
§63.10(f)	Waiver for Recordkeeping/Reporting	Procedures for Administrator to waive	Yes.
§63.11(b)	Flares	Requirements for flares	No.
§63.12	Delegation	State authority to enforce standards	Yes.
§63.13	Addresses	Addresses where reports, notifications, and requests are sent	Yes.
§63.14	Incorporations by Reference	Test methods incorporated by reference	Yes.
§63.15	Availability of Information	Public and confidential information	Yes.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4184, Jan. 24, 2011]

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

Technical Support Document (TSD) for a New Source Construction and  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

**Source Name:** Dean Baldwin Painting, LP  
**Source Location:** 2075 North Hoosier Boulevard, Peru, IN 46971  
**County:** Miami  
**SIC Code:** 4581  
**Operation Permit No.:** F103-30549-00046  
**Permit Reviewer:** Jason R. Krawczyk

On May 16, 2011, the Office of Air Quality (OAQ) received an application from Dean Baldwin Painting, LP related to the construction and operation of a new stationary aircraft refinishing facility.

**Existing Approvals**

There have been no previous approvals issued to this source.

**County Attainment Status**

The source is located in Miami County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (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. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Miami County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Other Criteria Pollutants  
Maimi County has been classified as attainment or unclassifiable in Indiana for all 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 and Part 70 Permit applicability.

### **Background and Description of New Source Construction**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Dean Baldwin Painting, LP on May 16, 2011, relating to the construction and operation of a new stationary aircraft refinishing facility.

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

- (a) One (1) aircraft refinishing operation, identified as REFINISH, approved for construction in 2011, consisting of multiple coating bays, with a combined nominal coating usage of 23 gallons per hour, using dry filters as particulate control, exhausting to several stacks (not to exceed 38), and consisting of:
- (1) Paint Stripping Operations, applying stripping solutions via non-atomizing wands or by hand application methods;
  - (2) Surface Cleaning Operations, applying cleaners via non-atomizing wands or by hand application methods;
  - (3) Surface Treatment Operations, applying surface treatments via HVLP, electrostatic air atomized, electrostatic airless, non-atomizing wands, or by hand application methods;
  - (4) Primer Coating Operations, applying primers via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency; and
  - (5) Topcoat Coating Operations, applying coatings via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency.

Under 40 CFR Part 63, Subpart HHHHHH, the aircraft refinishing operation (REFINISH) is considered an affected facility.

The following is a list of the insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, and consisting of:
- (1) Twelve (12) air make-up units, each with a nominal capacity of 9.0 MMBtu/hr.
- (b) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.

Under 40 CFR 63, Subpart CCCCCC, the units comprising this operation are considered affected facilities.

- (c) One (1) gasoline storage tank, with up to a 1,000 gallon storage capacity.

Under 40 CFR 63, Subpart CCCCCC, the gasoline storage tank is considered an affected facility.

- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.

- (e) The following VOC and HAP storage containers:

- (1) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons.

- (2) Vessels storing hydraulic oils

- (f) Water-based activities, including the following:

- (1) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.

- (2) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.

- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

- (h) Blowdown for compressors.

- (i) Paved and unpaved roadways and parking lots.

<b>Enforcement Issues</b>
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There are no pending enforcement actions related to this source.

<b>Emission Calculations</b>
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See Appendix A of this TSD for detailed emission calculations.

<b>Permit Level Determination – FESOP</b>
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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	79.76
PM10 <sup>(1)</sup>	82.46
PM2.5	82.46
SO <sub>2</sub>	0.28
NO <sub>x</sub>	47.30
VOC	316.76
CO	39.74

GHGs as CO <sub>2</sub> e	57,110
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- (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 (PM<sub>10</sub>), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Toluene	46.91
Xylene	4.38
Ethyl Benzene	0.88
Methyl Isobutyl Ketone	1.30
Chromium Compounds	10.88
Hexamethylene Diisocyanate	0.42
Hexane	0.85
Formaldehyde	0.04
<b>TOTAL HAPs</b>	<b>65.67</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of VOC is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of greenhouse gases (GHG) 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.

**PTE of the Entire Source After Issuance of the FESOP**

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.90	3.60	3.60	0.28	47.30	2.60	39.74	57,110	0.89	0.85 Hexane
REFINISH	78.87	78.87	78.87	-	-	97.30	-	-	24.00	9.90 Toluene
Roadways***	0.24	0.05	0.01	-	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>79.76</b>	<b>82.46</b>	<b>82.46</b>	<b>0.28</b>	<b>47.30</b>	<b>99.90</b>	<b>39.74</b>	<b>57,110</b>	<b>24.89</b>	<b>9.90 Toluene</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

\* 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.

\*\*\* Fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability.

(a) FESOP Status / PSD Minor Source

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

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-4.1 (MACT) not applicable, the source shall comply with the following:

- (1) The total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, to the aircraft refinishing operation (REFINISH), minus the amount of VOC in waste shipped offsite, shall be limited to 97.30 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The total input of any single HAP, including coatings, dilution solvents, and cleaning solvents, to the aircraft refinishing operation (REFINISH), minus the amount of single HAP in waste shipped offsite, shall be limited to 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (3) The total input of combined HAPs, including coatings, dilution solvents, and cleaning solvents, to the aircraft refinishing operation (REFINISH), minus the amount of combined HAPs in waste shipped offsite, shall be limited to 24.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive

month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (MACT) not applicable.

<b>Federal Rule Applicability Determination</b>
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New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit, since no VOL storage vessel at the facility has a capacity greater than or equal to 75 cubic meters (m<sup>3</sup>), which is equal to 19,813 gallons.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-6), are not included in the permit, since wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Aerospace Manufacturing and Rework Facilities, 40 CFR 63.741, Subpart GG (326 IAC 20-15), are not included in the permit, since this source is not considered a major source as defined in 40 CFR 63.2.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in the permit, since is not a major source, is not located at a major source, and is not part of a major source of emissions of HAP.
- (f) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD (326 IAC 20-95) are not included in the permit, because the natural gas-fired air make-up units are not process heaters and this source is not a major source of HAPs.
- (g) The source is subject to the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (40 CFR 63, Subpart CCCCCC), because the source has a gasoline dispensing facility (GDF) and is considered an area source.

The units subject to this rule include the following:

- (1) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.  
  
Under 40 CFR 63, Subpart CCCCCC, the units comprising this operation are considered affected facilities.
- (2) One (1) gasoline storage tank, with up to a 1,000 gallon storage capacity.  
  
Under 40 CFR 63, Subpart CCCCCC, the gasoline storage tank is considered an affected facility.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11110
- (2) 40 CFR 63.11111(a),(b),(e),(f),(g),(h),(i),(j), and (k)
- (3) 40 CFR 63.11112(a) and (b)
- (4) 40 CFR 63.11113(a) and (d)
- (5) 40 CFR 63.11115(a)
- (6) 40 CFR 63.11116
- (7) 40 CFR 63.11130
- (8) 40 CFR 63.11131
- (9) 40 CFR 63.11132
- (10) Table 3

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the gasoline fuel transfer dispensing operation except as otherwise specified in 40 CFR 63, Subpart CCCCC.

- (h) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, because it performs spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

The units subject to this rule include the following:

- (1) One (1) aircraft refinishing operation, identified as REFINISH, approved for construction in 2011, consisting of multiple coating bays, with a combined nominal coating usage of 23 gallons per hour, using dry filters as particulate control, exhausting to several stacks (not to exceed 38), and consisting of:
  - (A) Paint Stripping Operations, applying stripping solutions via non-atomizing wands or by hand application methods;
  - (B) Surface Cleaning Operations, applying cleaners via non-atomizing wands or by hand application methods;
  - (C) Surface Treatment Operations, applying surface treatments via HVLP, electrostatic air atomized, electrostatic airless, non-atomizing wands, or by hand application methods;
  - (D) Primer Coating Operations, applying primers via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency; and
  - (E) Topcoat Coating Operations, applying coatings via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency.

Under 40 CFR Part 63, Subpart HHHHHH, the aircraft refinishing operation (REFINISH) is considered an affected facility.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11169(c) and (d)(5)

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

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

- (i) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (63.11193 through 63.11237), are not included in the permit, because the source does not contain boilers. This source only contains natural gas-fired air make-up units.
- (j) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

#### Compliance Assurance Monitoring (CAM)

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

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

- (a) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The unlimited potential to emit of HAPs from the new units is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the new units to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte

County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
Pursuant to 326 IAC 6-5, this source is not subject to this rule, because it does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (h) 326 IAC 8-6 (VOC Rules: Organic Solvent Emission Limitations)  
Pursuant to 326 IAC 8-6-1, this rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. Pursuant to 326 IAC 8-6-1, this source is not subject to the requirements 326 IAC 8-6, because this source, which is located in Miami County, did not commence operation after October 7, 1974 and prior to January 1, 1980, and does not have potential VOC emissions of 100 tons per year or more.
- (i) 326 IAC 8-7 (VOC Rules; Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)  
Pursuant to 326 IAC 8-7-2(a), this source is not subject to the requirements of 326 IAC 8-7, since it is not located in Lake, Porter, Clark, or Floyd County.

#### Aircraft Refinishing Operations

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(d), particulate emissions from the aircraft refinishing operation (REFINISH) shall be controlled by dry filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (k) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The unlimited VOC potential emissions from the aircraft refinishing operation (REFINISH) are greater than twenty-five (25) tons per year. Therefore, the aircraft refinishing operations are subject to 326 IAC 8-1-6 and the applicant is required to control VOC emissions using the Best Available Control Technology (BACT). According to the BACT analysis contained in Appendix B, IDEM has determined that:  
  
Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the Permittee shall control VOC emissions from the aircraft refinishing operations using the Best Available Control Technology (BACT), which has been determined to be the following:

- (1) The following management and work practices shall apply to the REFINISH operation:
  - (A) VOC emissions from primers shall be limited to a VOC content level of no more than: 540 g/L (4.5 lb/gal) of primer (less water and exempt solvents), as applied, and as determined on a monthly volume-weighted average.
  - (B) VOC emissions from topcoats shall be limited to a VOC content level of no more than: 540 g/L (4.5 lb/gal) of coating (less water and exempt solvents) as applied, and as determined on a monthly volume-weighted average. VOC emissions from self-priming topcoats shall be limited to a VOC content level of no more than: 540 g/L (4.5 lb/gal) of self-priming topcoat (less water) as applied, and as determined on a monthly volume-weighted average.
  - (C) Place used solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent.
  - (D) Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
  - (E) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
  - (F) Clean spray guns by one of the following methods:
    - (i) Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun. If electing to clean spray guns by this method, the Permittee shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system, while the system is in operation, at least once per month. If leaks are found during the monthly inspection, repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed, and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued;
    - (ii) Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use;
    - (iii) Disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components;
    - (iv) Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent

- emissions; or
- (v) Empty the used cleaning solvent each time aerospace parts or assemblies, or components of a coating unit (with the exception of spray guns) are flush cleaned into an enclosed container or collection system that is kept closed when not in use or into a system with equivalent emission control.
- (G) All primers and topcoats (including self-priming topcoats) shall be applied using one or more of the application techniques specified below:
- (i) Flow/curtain coat application;
  - (ii) Dip coat application;
  - (iii) Roll coating;
  - (iv) Brush coating;
  - (v) Cotton-tipped swab application;
  - (vi) Electrodeposition (dip) coating;
  - (vii) High volume low pressure (HVLP) spraying;
  - (viii) Electrostatic spray application; or
  - (ix) Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods.
- (H) All application devices used to apply primers or topcoats (including self-priming topcoats) shall be operated according to company procedures, local specified operating procedures, and/or the manufacturer's specifications, whichever is most stringent, at all times. Equipment modified by the facility shall maintain a transfer efficiency equivalent to HVLP and electrostatic spray application techniques.
- (l) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)  
Pursuant to 326 IAC 8-2-9(b)(2), the application of coatings to exterior of airplanes is exempt from the requirements of 326 IAC 8-2-9. Therefore, the requirements of 326 IAC 8-2-9 are not applicable and are not included in the permit.
- (m) 326 IAC 8-21 (Aerospace Manufacturing and Rework Operations)  
Although the aircraft refinishing operation (REFINISH) has the potential to emit volatile organic compounds (VOC) equal to or greater than twenty-five (25) tons per year for all coating and cleaning operations combined, where aerospace components and vehicles are coated and cleaned, the source is not located in Lake or Porter Counties. Therefore, the requirements of 326 IAC 8-21 are not applicable.

#### Natural Gas-Fired Heaters

- (n) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)  
Each of the air make-up units at this source is not subject to the requirements of 326 IAC 6-2, because they each are not an indirect heating unit.

- (o) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Each of the air make-up units at this source is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), each of the air make-up units at this source is also exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions of less than five hundred fifty one thousandths (0.551) pound per hour.
- (p) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
Pursuant to 326 IAC 7-1.1-1, each of the air make-up units at this source is not subject to the requirements of 326 IAC 7-1.1, since each has unlimited sulfur dioxide (SO<sub>2</sub>) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.
- (q) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the air make-up units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each unit is less than twenty-five (25) tons per year.

#### Fuel Storage Tanks and Fuel Dispensing Facilities

- (r) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the fuel storage tanks and the fuel dispensing facilities is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each unit is less than twenty-five (25) tons per year.
- (s) 326 IAC 8-4-3 (Petroleum Sources; Petroleum Liquid Storage Facilities)  
Pursuant to 326 IAC 8-4-1(c) and 326 IAC 8-4-3(a), each of the storage vessels at this source is not subject to the requirements of 326 IAC 8-4-3, since:
  - (1) the gasoline storage tank (approved for construction in 2011, 1,000 gallon capacity), will be constructed after January 1, 1980, and will have a storage capacity less than thirty-nine thousand (39,000) gallons;
  - (2) the petroleum fuel storage tank, which will be constructed after January 1, 1980, will have a storage capacity less than thirty-nine thousand (39,000) gallons, and will store petroleum fuel which has a true vapor pressure less than 1.52 psi at the storage temperature; and
  - (3) each of the other VOC and HAP storage containers, which will be constructed after January 1, 1980, will have a storage capacity less than thirty-nine thousand (39,000) gallons, and will store oil which has a true vapor pressure less than 1.52 psi at the storage temperature or will not store a petroleum liquid.
- (t) 326 IAC 8-4-4 (Petroleum Sources: Bulk Gasoline Terminals)  
This source is not subject to the requirements 326 IAC 8-4-4, because this source is not a bulk gasoline terminal.
- (u) 326 IAC 8-4-6 (Petroleum Sources: Gasoline Dispensing Facilities)  
The fuel dispensing facilities at this source are not subject to the requirements 326 IAC 8-4-6, since:
  - (1) the gasoline dispensing facility at this source does not have a monthly gasoline throughput of ten thousand (10,000) gallons per month or greater; and
  - (2) the petroleum fuel dispensing facilities and each of the other VOC and HAP storage

containers are each not considered gasoline dispensing facilities as defined by 326 IAC 8-4-6(a)(8).

- (v) 326 IAC 8-9 (VOC Rules; Volatile Organic Liquid Storage Vessels)  
Pursuant to 326 IAC 8-9-1(a), this source is not subject to the requirements of 326 IAC 8-9, since it is not located in Lake, Porter, Clark, or Floyd County.
- (w) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (x) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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- (a) The compliance determination and monitoring requirements applicable to this source are as follows:
  - (1) Compliance with the VOC and/or HAP content and input limitations for the aircraft refinishing operation (REFINISH) 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 and/or HAP 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.
  - (2) Compliance with the VOC content limits for the topcoats and primers shall be determined by the following:
    - (A) For topcoats and primers complying with the VOC content limits without averaging, compliance with the VOC content limitations 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.
    - (B) For topcoats and primers that are averaged in order to comply with the primer and topcoat VOC content limits, the monthly volume-weighted average VOC content per volume of coating (less water and exempt solvents) as applied, shall be determined by the following equation:

$$G_a = \frac{\sum_{i=1}^n (VOC)_i V_i}{C_{H_2O}}$$

Where:

G<sub>a</sub> = volume weighted average mass of VOC per unit volume of coating (lb/gal) (less water and exempt solvent) as applied during each 30-day period for those coatings being averaged.

- $n$  = number of coatings being averaged.
- $(\text{VOC})_{ci}$  = VOC content (lb/gal) of coating  $i$  (less water and exempt solvents) as applied that is being averaged during the 30-day period
- $V_{ci}$  = volume (gal) of coating  $i$  (less water and exempt solvents) as applied that is being averaged during the 30-day period.
- $C_{\text{lwes}}$  = total volume (gal) of all coatings (less water and exempt solvents) as applied during each 30-day period for those coatings being averaged.

(3) If the amount of VOC and/or HAPs in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC and/or HAP input reported, the Permittee shall determine the VOC and/or HAP content of the waste shipped offsite using one or a combination of the following methods:

(A) On-Site Sampling

- (i) VOC and/or HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
- (ii) A representative sample of the VOC and/or HAP containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this permit F103-30549-00046.
- (iii) If multiple waste streams are collected and bulked separately, a sample shall be collected and analyzed from each waste stream.
- (iv) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC and/or HAP content of the VOC and/or HAP containing waste. Such change could include, but is not limited to, the following:
  - (I) A change in VOC and/or HAP material usage selection or formulation, as supplied or as applied, or
  - (II) An operational change in the VOC and/or HAP material usage application or cleanup operations.

The new VOC and/or HAP content shall be used in calculating the amount of VOC and/or HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

- (B) Certified Waste Report: The VOC and/or HAP reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC and/or HAP in the waste.
- (C) Minimum Assumed VOC and/or HAP content: The VOC and/or HAP content of the waste shipped offsite may be assumed to be equal to the VOC and/or HAP content of the material with the lowest VOC and/or HAP content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC and/or HAP data sheets, for each month.

- (4) IDEM reserves the right to request a representative sample of the VOC and/or HAP containing waste stream and conduct an analysis for VOC and/or HAP content.
- (5) Compliance with the VOC and HAP input limitations contained in Condition D.1.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound and/or hazardous air pollutant input for the previous month, minus the amount VOC and/or HAPs in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC and/or HAP input, minus the amount VOC and/or HAP in the waste shipped out for recycling or disposal, so as to arrive at VOC and/or HAP input for the most recent twelve (12) consecutive month period.
- (6) The VOC and/or HAP input for a month shall be calculated using the following equation:

$$\text{VOC and/or HAP input} = \text{SCL} - \text{SR}$$

Where:

SCL = The total amount of VOC and/or HAP containing materials, in tons, including coatings, from the source; and

SR = The total amount of VOC and/or HAP containing materials, in tons, shipped out for either recycling or disposal, including coatings, from the source.

- (7) Filter and overspray inspections as indicated in the table below:

Emission Unit / Control	Parameters	Frequency	Excursions and Exceedances
REFINISH / Dry Filters	Filter Inspection	Daily	Response Steps
	Overspray	Weekly	
	Overspray	Monthly	

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

<b>Conclusion and Recommendation</b>
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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 May 16, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F103-30549-00046. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk 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) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.
- (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:** Dean Baldwin Painting, LP  
**Address City IN Zip:** 2075 North Hoosier Boulevard, Peru, IN 46971  
**Permit Number:** 103-30549-00046  
**Plt ID:** 103-00046  
**Reviewer:** Jason R. Krawczyk  
**Date:** July 5, 2011

<b>Uncontrolled / Unlimited Emissions (Tons/Yr)</b>				
Pollutant	Natural Gas Combustion	Coating Operations	Roadways (Fugitive)	Total
PM	0.90	78.87	0.24	79.76
PM10	3.60	78.87	0.05	82.46
PM2.5	3.60	78.87	0.01	82.46
VOC	2.60	314.16	-	316.76
NOx	47.30	-	-	47.30
SO2	0.28	-	-	0.28
CO	39.74	-	-	39.74
GHGs as CO2e	57,110	-	-	57,110
Single HAP (Toluene)	0.002	46.91	-	46.91
Combined HAPs	0.89	64.77	-	65.67

<b>Controlled / Unlimited Emissions (Tons/Yr)</b>				
Pollutant	Natural Gas Combustion	Coating Operations	Roadways (Fugitive)	Total
PM	0.90	1.58	0.24	2.48
PM10	3.60	1.58	0.05	5.17
PM2.5	3.60	1.58	0.01	5.17
VOC	2.60	314.16	-	316.76
NOx	47.30	-	-	47.30
SO2	0.28	-	-	0.28
CO	39.74	-	-	39.74
GHGs as CO2e	57,110	-	-	57,110
Single HAP (Toluene)	0.002	46.91	-	46.91
Combined HAPs	0.89	64.77	-	65.67

<b>Limited / Uncontrolled Emissions (Tons/Yr)</b>				
Pollutant	Natural Gas Combustion	Coating Operations	Roadways (Fugitive)	Total
PM	0.90	78.87	0.24	79.76
PM10	3.60	78.87	0.05	82.46
PM2.5	3.60	78.87	0.01	82.46
VOC*	2.60	97.30	-	99.90
NOx	47.30	-	-	47.30
SO2	0.28	-	-	0.28
CO	39.74	-	-	39.74
GHGs as CO2e	57,110	-	-	57,110
Single HAP (Toluene)**	0.002	9.90	-	9.90
Combined HAPs***	0.89	24.00	-	24.89

**Note:**

\* The total input of volatile organic compounds (VOC), minus the amount of VOC in waste shipped offsite, shall be limited to 97.30 tons per twelve (12) consecutive month period.

\*\* The total input of any single HAP, minus the amount of single HAP in waste shipped offsite, shall be limited to 9.90 tons per twelve (12) consecutive month period.

\*\*\* The total input of combined HAPs, minus the amount of combined HAPs in waste shipped offsite, shall be limited to 24.00 tons per twelve (12) consecutive month period.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

**Company Name: Dean Baldwin Painting, LP**  
**Address City IN Zip: 2075 North Hoosier Boulevard, Peru, IN 46971**  
**Permit Number: 103-30549-00046**  
**Plt ID: 103-00046**  
**Reviewer: Jason R. Krawczyk**  
**Date: July 5, 2011**

Heat Input Capacity <u>MMBtu/hr</u>	Potential Throughput <u>MMCF/yr</u>	Emission Unit <u>ID</u>
108.00	946.08	Twelve (12) air-make up units @ 9.0 MMBtu/hr, each.

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.90	3.60	0.28	47.30	2.60	39.74

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

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

**Methodology:**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
HAPs Emissions**

**Company Name:** Dean Baldwin Painting, LP  
**Address City IN Zip:** 2075 North Hoosier Boulevard, Peru, IN 46971  
**Permit Number:** 103-30549-00046  
**Plt ID:** 103-00046  
**Reviewer:** Jason R. Krawczyk  
**Date:** July 5, 2011

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.934E-04	5.676E-04	3.548E-02	8.51E-01	1.608E-03

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.365E-04	5.203E-04	6.623E-04	1.798E-04	9.934E-04

**Combined HAPs: 0.89**

Methodology is the same as page 2.

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Greenhouse Gas Emissions**

**Company Name:** Dean Baldwin Painting, LP  
**Address City IN Zip:** 2075 North Hoosier Boulevard, Peru, IN 46971  
**Permit Number:** 103-30549-00046  
**Plt ID:** 103-00046  
**Reviewer:** Jason R. Krawczyk  
**Date:** July 5, 2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	56764.80	1.09	1.04
Summed Potential Emissions in tons/yr	56766.93		
CO2e Total in tons/yr	57110.26		

**Methodology:**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

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

Company Name: Dean Baldwin Painting, LP  
Address City IN Zip: 2075 North Hoosier Boulevard, Peru, IN 46971  
Permit Number: 103-30549-00046  
Pit ID: 103-00046  
Reviewer: Jason R. Krawczyk  
Date: July 5, 2011

Material	Component	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water / Exempt	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (ton/yr)	Transfer Efficiency (%)**	Particulate Control Efficiency (%)		
<b>Stripping Solution</b>																				
Turco 6776-LO	N/A	8.59	38.80%	0.0%	38.8%	0.0%	60.00%	1.00	12.00	3.33	3.33	40.00	959.90	175.18	2.76	0.06	99%	98.00%		
<b>As Applied Total:</b>											<b>3.33</b>	<b>3.33</b>	<b>40.00</b>	<b>959.90</b>	<b>175.18</b>	<b>2.76</b>	<b>0.06</b>			
<b>Surface Cleaner</b>																				
Cee-Bee Super Bee 210	N/A	8.84	N/A	N/A	N/A	N/A	10.00%	1.00	0.50	0.92	0.92	0.46	11.02	2.01	0.19	0.00	99%	98.00%		
<b>As Applied Total:</b>											<b>0.92</b>	<b>0.92</b>	<b>0.46</b>	<b>11.02</b>	<b>2.01</b>	<b>0.19</b>	<b>0.00</b>			
<b>Surface Treatment</b>																				
PR-1422	Part A	11.51	N/A	N/A	N/A	N/A	18.00%	0.10	4.00	0.00	0.00	0.00	0.00	0.00	0.91	0.02	75%	98.00%		
PR-1422	Part B	11.50	N/A	N/A	N/A	N/A	96.60%	0.90	4.00	0.87	0.87	3.13	75.17	13.72	43.79	0.88	75%	98.00%		
<b>As Applied Total:</b>											<b>0.44</b>	<b>0.44</b>	<b>3.13</b>	<b>75.17</b>	<b>13.72</b>	<b>44.70</b>	<b>0.89</b>			
<b>Primer</b>																				
EP-2-Y1	Base	13.24	N/A	N/A	N/A	N/A	61.25%	0.5000	1.500	2.40	2.40	1.80	43.15	7.87	6.66	0.13	75%	98.00%		
EH-12	Hardener	8.01	N/A	N/A	N/A	N/A	47.86%	0.2500	1.500	3.41	3.41	1.28	30.65	5.59	1.57	0.03	75%	98.00%		
SC-11	Catalyst	7.91	N/A	N/A	N/A	N/A	39.40%	0.2500	1.500	4.27	4.27	1.60	38.46	7.02	1.28	0.03	75%	98.00%		
<b>As Applied Total:</b>											<b>3.12</b>	<b>3.12</b>	<b>4.68</b>	<b>112.25</b>	<b>20.49</b>	<b>9.52</b>	<b>0.19</b>			
<b>Topcoat*</b>																				
ECL-G-506; Green BAC 4372	Base A	10.01	N/A	N/A	N/A	N/A	51.00%	0.50	4.00	3.30	3.30	6.60	158.40	28.91	11.18	0.22	75%	98.00%		
ECL-G-900; Silver Sparkle	Base B	8.70	N/A	N/A	N/A	N/A	36.00%	0.50	4.00	4.30	4.30	8.60	206.40	37.67	6.86	0.14	75%	98.00%		
PC-233	Curing Solution	9.70	N/A	N/A	N/A	N/A	99.00%	0.25	4.00	0.19	0.19	0.19	4.56	0.83	10.52	0.21	75%	98.00%		
TR-109	Reducer	7.50	N/A	N/A	N/A	N/A	0.00%	0.25	4.00	7.50	7.50	7.50	180.00	32.85	0.00	0.00	75%	98.00%		
<b>As Applied (Worst Case) Total:</b>											<b>4.07</b>	<b>4.07</b>	<b>16.29</b>	<b>390.96</b>	<b>71.35</b>	<b>21.69</b>	<b>0.43</b>			
<b>Solvent***</b>																				
Toluene	N/A	7.17	100.00%	0.0%	100.0%	0.0%	0.00%	1.00	1.00	7.17	7.17	7.17	172.14	31.42	0.00	0.00	99%	98.00%		
<b>As Applied Total:</b>											<b>7.17</b>	<b>7.17</b>	<b>7.17</b>	<b>172.14</b>	<b>31.42</b>	<b>0.00</b>	<b>0.00</b>			
<b>Total Potential to Emit:</b>												<b>71.73</b>	<b>1721.43</b>	<b>314.16</b>	<b>78.87</b>	<b>1.58</b>				

**Note:**  
\*Either Base A or Base B can be used in addition to the curing solution and reducer for the topcoat. Therefore the worst case coating was used in determining potential to emit.  
\*\*Stripping Solution, Surface Cleaner, and Solvents are applied via hand or non-atomizing wand.  
\*\*\*Toluene is used in the stripping and surface cleaning operations and is representative of the worst case HAP containing solvent that will be used in the REFINISH operations.

**Methodology (Where Weight % Volatile was known):**  
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Uncontrolled Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Weight % Volatiles) \* (1-Transfer efficiency(%)) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
Controlled Particulate Potential Tons per Year = Uncontrolled Particulate Potential Tons per Year \* (1 - Particulate Control Efficiency (%))

**Methodology (Where MSDS Listed VOC per Gallon of Coating)**  
Pounds of VOC per Gallon Coating Less Water = Pounds of VOC per Gallon Coating as provided in MSDS sheets  
Pounds of VOC per Gallon Coating = Pounds of VOC per Gallon Coating as provided in MSDS sheets  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Uncontrolled Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Weight % Volatiles) \* (1-Transfer efficiency(%)) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
Controlled Particulate Potential Tons per Year = Uncontrolled Particulate Potential Tons per Year \* (1 - Particulate Control Efficiency (%))

**Appendix A: Emission Calculations  
HAP Emission Calculations  
From Surface Coating Operations**

**Company Name: Dean Baldwin Painting, LP  
Address City IN Zip: 2075 North Hoosier Boulevard, Peru, IN 46971  
Permit Number: 103-30549-00046  
Pit ID: 103-00046  
Reviewer: Jason R. Krawczyk  
Date: July 5, 2011**

Material	Component	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % MIBK	Weight % Compound s	Weight % Hexamethylene Diisocyanate	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Chromium Compound s Emissions (ton/yr)	Hexamethylene Diisocyanate Emissions (ton/yr)
<b>Stripping Solution</b>																
Turco 6776-LO	N/A	8.59	1.00	12.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
<b>As Applied Total:</b>											<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>Surface Cleaner</b>																
Cee-Bee Super Bee 210	N/A	8.84	1.00	0.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
<b>As Applied Total:</b>											<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>Surface Treatment</b>																
PR-1422	Part A	11.51	0.50	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
PR-1422	Part B	11.50	0.50	4.00	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	5.04	0.00	0.00	0.00	0.00
<b>As Applied Total:</b>											<b>0.00</b>	<b>5.04</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>Primer</b>																
EP-2-Y1	Base	13.24	0.5000	1.500	0.00%	0.00%	0.00%	0.00%	25.00%	0.00%	0.00	0.00	0.00	0.00	10.88	0.00
EH-12	Hardener	8.01	0.2500	1.500	0.00%	40.00%	0.00%	0.00%	0.00%	0.00%	0.00	5.26	0.00	0.00	0.00	0.00
SC-11	Catalyst	7.91	0.2500	1.500	0.00%	40.00%	0.00%	10.00%	0.00%	0.00%	0.00	5.20	0.00	1.30	0.00	0.00
<b>As Applied Total:</b>											<b>0.00</b>	<b>10.46</b>	<b>0.00</b>	<b>1.30</b>	<b>10.88</b>	<b>0.00</b>
<b>Topcoat*</b>																
ECL-G-506; Green BAC 4372	Base A	10.01	0.50	4.00	5.00%	0.00%	1.00%	0.00%	0.00%	0.00%	4.38	0.00	0.88	0.00	0.00	0.00
ECL-G-900; Silver Sparkle	Base B	8.70	0.50	4.00	5.00%	0.00%	1.00%	0.00%	0.00%	0.00%	3.81	0.00	0.76	0.00	0.00	0.00
PC-233	Curing Solution	9.70	0.25	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00	0.00	0.00	0.00	0.00	0.42
TR-109	Reducer	7.50	0.25	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
<b>As Applied (Worst Case) Total:</b>											<b>4.38</b>	<b>0.00</b>	<b>0.88</b>	<b>0.00</b>	<b>0.00</b>	<b>0.42</b>
<b>Solvent</b>																
Toluene	N/A	7.17	1.00	1.00	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00	31.42	0.00	0.00	0.00	0.00
<b>As Applied Total:</b>											<b>0.00</b>	<b>31.42</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>Total Potential to Emit:</b>											<b>4.38</b>	<b>46.91</b>	<b>0.88</b>	<b>1.30</b>	<b>10.88</b>	<b>0.42</b>

**Combined HAP Potential to Emit: 64.77**

**Note:**  
Chromium compounds consist of Strontium Chromate.

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

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name: Dean Baldwin Painting, LP  
Source Address: 2075 North Hoosier Boulevard, Peru, IN 46971  
Permit Number: 103-30549-00046  
Source ID: 103-00046  
Reviewer: Jason R. Krawczyk  
Date: July 5, 2011**

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	1.0	1.0	40.0	40.0	1000	0.189	0.2	69.1
Vehicle (leaving plant) (one-way trip)	1.0	1.0	1.0	40.0	40.0	1000	0.189	0.2	69.1
<b>Total</b>	<b>2.0</b>		<b>2.0</b>		<b>80.0</b>			<b>0.38</b>	<b>138.26</b>

Average Vehicle Weight Per Trip =  tons/trip  
Average Miles Per Trip =  miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	40.0	40.0	40.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = mean silt loading for iron and steel production facilities (AP-42 Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
where p =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N =  days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	3.745	0.749	0.1838	lb/mile
Mitigated Emission Factor, $E_{ext} =$	3.424	0.685	0.1681	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.13	0.026	0.0064	0.12	0.024	0.0058
Vehicle (leaving plant) (one-way trip)	0.13	0.026	0.0064	0.12	0.024	0.0058
<b>Total</b>	<b>0.26</b>	<b>0.052</b>	<b>0.013</b>	<b>0.24</b>	<b>0.047</b>	<b>0.012</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particle Matter (<2.5 um)  
PTE = Potential to Emit

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

**Appendix B  
Best Available Control Technology (BACT) Determination**

Technical Support Document (TSD) for a New Source Construction and  
Federally Enforceable State Operating Permit (FESOP)

**Source Background and Description**

Source Name:	Dean Baldwin Painting, LP
Source Location:	2075 North Hoosier Boulevard, Peru, IN 46971
County:	Miami
SIC Code:	4581
Operation Permit No.:	F103-30549-00046
Permit Reviewer:	Jason R. Krawczyk

**Background Information**

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review for Dean Baldwin Painting, LP's new stationary aircraft refinishing facility, to be located at 2075 North Hoosier Boulevard, Peru, IN 46971. The following emission units will have the potential to emit volatile organic compounds (VOCs) greater than twenty-five (25) tons per twelve (12) consecutive month period. Pursuant to the provisions of 326 IAC 8-1-6, Best Available Control Technology analyses for VOC were performed for the following units:

- (a) One (1) aircraft refinishing operation, identified as REFINISH, approved for construction in 2011, consisting of multiple coating bays, with a combined nominal coating usage of 23 gallons per hour, using dry filters as particulate control, exhausting to several stacks (not to exceed 38), and consisting of:
- (1) Paint Stripping Operations, applying stripping solutions via non-atomizing wands or by hand application methods;
  - (2) Surface Cleaning Operations, applying cleaners via non-atomizing wands or by hand application methods;
  - (3) Surface Treatment Operations, applying surface treatments via HVLP, electrostatic air atomized, electrostatic airless, non-atomizing wands, or by hand application methods;
  - (4) Primer Coating Operations, applying primers via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency; and
  - (5) Topcoat Coating Operations, applying coatings via HVLP, electrostatic air atomized, electrostatic airless, and/or methods of application with equivalent transfer efficiency.

Under 40 CFR Part 63, Subpart HHHHHH, the aircraft refinishing operation (REFINISH) is considered an affected facility.

IDEM, OAQ conducts BACT analyses in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below.

- (1) Identify all potentially available control options;

- (2) Eliminate technically infeasible control options;
- (3) Rank remaining control technologies;
- (4) Evaluate the most effective controls and document the results; and
- (5) Select BACT.

Also in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, BACT analyses take into account the energy, environmental, and economic impacts of the control options. Emission reductions may be determined through the application of available control techniques, process design, and/or operational limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause adverse environmental effects to public health and the environment.

### VOC BACT Analysis

#### Step One: Identify All Potentially Available Control Technologies

Based on the information reviewed for this BACT determination, the following potentially available control technologies were identified for controlling VOC emissions from the aircraft refinishing operation:

(a) Thermal Oxidation

Thermal oxidizers regularly achieve 97% to 99% destruction efficiencies because of the inherent efficiency of the combustion processes. Thermal oxidizers typically consist of an enclosed combustion chamber with an auxiliary burner fired with a conventional fuel. The firing rate of the burner is automatically controlled to maintain a preset combustion chamber temperature. Thermal oxidizers provide maximum operating flexibility because they can handle most known VOCs at a wide range of concentrations and flows. However, thermal oxidizers require relatively high fuel input because of operating temperatures. Heat recovery is frequently used with thermal oxidation systems to minimize the fuel operating cost, especially with low concentrations of VOC. Heat recovery devices used in VOC systems are most commonly indirect recuperative heat exchangers or thermal mass regenerative heat exchangers.

(1) Recuperative Thermal Oxidizers

These systems employ an indirect heat exchanger device to preheat the VOC laden fume. They are applied to oxidizers that operate at temperatures as high as 1800°F. The maximum design efficiency is usually dictated by the exchanger outlet temperature and the VOC content in the stream.

(2) Regenerative Thermal Oxidizers (RTO)

These systems employ a large thermal mass to collect the heat and return it to the incoming fume. Each oxidizer is supplied with several large "cells" which are filled with ceramic packing. The cells are alternated from heat-up to cool-down cycles for fume preheating by a series of dampers and ducts on the outlet side of the system. These units can achieve high removal efficiencies (95-98%) at relatively low temperatures (1400-1500°F) because of the thorough mixing in the ceramic packing sections. These systems are more maintenance-intensive than recuperative types because of the mechanical system that performs the alternating of cells.

(b) Catalytic Oxidation

Removal efficiencies of 95% are commonly achieved and some units are designed for temperatures as low as 98°F. Catalytic oxidation units consist of an enclosed combustion chamber with an

auxiliary burner firing on a conventional fuel gas followed by a catalyst section. The burner is used to heat the contaminated air stream gas to approximately 600°F before it contacts the catalyst. Here, oxidation of the organic material occurs and the gases exit the catalyst bed at a higher temperature. The principle advantage of the catalytic system is lower operating temperatures and the resulting lower fuel consumption. Catalytic systems handle a wide range of VOCs but are less flexible than thermal oxidizers. Catalytic systems are usually limited to 1100-1300°F outlet temperatures, which limits VOC inputs to a maximum of 25% of LEL. As with the thermal oxidizers, fume preheating devices are commonly used to minimize operating costs.

(1) Precious Metal Type (Platinum, Palladium, etc.)

Precious metals catalyst chambers are usually constructed of a ceramic or metallic substrate with the catalyst applied to the substrate. The catalyst assembly is stationary. These catalysts are highly efficient in a clean state but are subject to deactivation by several mechanisms. Sulfur, phosphorus, halogens, bismuth and heavy metals such as zinc, lead, arsenic, antimony, mercury, iron oxide, tin, and silicon can poison the catalyst bed in a non-reversible manner. A thorough understanding of the VOC constituents is necessary to apply this type of control device.

(2) Non-Precious Metal Type (Chromium, Manganese, etc.)

These systems are usually less susceptible to poisoning and deactivation, but require larger amounts of catalyst. These are usually in bulk form, applied to a ceramic substance and are arranged on a grid or screen. Catalyst beds are usually fixed relative to fume flow; however, there are fluidized bed types that negate the blinding by organic solids. The VOC constituents must be known to apply this control device.

(c) Carbon Adsorption

Adsorption itself is a phenomenon where gas molecules passing through a bed of solid particles are selectively held there by attractive forces which are weaker and less specific than those of chemical bonds. During adsorption, a gas molecule migrates from the gas stream to the surface of the solid where it is held by physical attraction. Adsorbents in large scale use include activated carbon, silica gel, activated alumina, synthetic zeolites, fuller's earth, and other clays. The most commonly used is activated carbon. The adsorption of VOCs on activated carbon is dependent upon two factors. The first is the equilibrium relationship between the particular VOC, or mixture of VOCs, and the activated carbon adsorbent. The second is the rate of transfer of the VOC from the gas stream to the adsorption sites within the activated carbon. The equilibrium relationship between the gas and the carbon is a function of the VOC concentration, temperature, and total pressure. After adsorption, most gases can be removed, or desorbed for the adsorbent by heating to a sufficiently high temperature, usually via steam or hot combustion gases, or by reducing the pressure to a sufficiently low value. The adsorbates can typically be recovered and concentrated after being desorbed.

(d) Condensation Systems

Emissions sources that have low flow rates of high concentration VOCs (up to 100%) such as tank vents are ideal applications for refrigerated and cryogenic condensers. The condensed liquid is returned to the process and non-condensable liquids (with low levels of VOCs) are vented to the atmosphere.

(1) Single Stage

Single stage systems, which can reduce the vented gas stream to minus 20°F, can be used for high boiling compounds (such as gasoline tank vapors from tank transfer operations), and can achieve 90-95% control efficiencies. High control efficiencies require lower temperatures and more complexity such as multiple stages and pumping systems.

(2) Multi-Stage Systems

Cascade (multi-stage) condensing systems using cryogenics can produce temperatures as low as minus 120°F. These systems are required for lower molecular weight VOCs with high vapor pressures or for vent streams with significant condensables such as nitrogen from air.

(e) Bio-Filtration

Bio-filtration systems are designed to follow three basic steps. First, a pollutant in the gas phase is passed through a biologically active packed bed. The pollutant then diffuses into the biofilm immobilized on the packing medium. Finally, microorganisms growing in the biofilm oxidize the pollutant as a primary substrate or co-metabolite and in the process convert contaminants into the benign end products of carbon dioxide, water and additional biomass. Based on available data,

Three primary bioreactor configurations are available to treat stationary sources of air pollution such as those emitted from spray booths: bio-filters, bio-trickling filters, and bio-scrubbers.

(1) Bio-Filters

Bio-filters are the simplest and oldest of the three vapor-phase bioreactors and involve passing a contaminated air stream through a reactor containing biologically-active packing material. The contaminants are transferred from the air stream into a bio-film immobilized on the support media and are converted by the microorganisms into CO<sub>2</sub>, water, and additional biomass. Moisture is typically supplied to the bio-film in a humid inlet waste gas stream. Packing media used in bio-filter beds can be broadly categorized as either "natural" or "synthetic". Natural media include wood chips, peat, and compost, with compost by far the most widely used. Synthetic media include activated carbon, ceramic pellets, polystyrene beads, ground tires, plastic media, and polyurethane foam. Natural organic packing media generally contain a supply of nutrients as a naturally occurring component of the packing itself. When a synthetic support medium is used, nutrients must be added for microbial growth.

(2) Bio-Trickling Filters

Bio-trickling filters are similar to bio-filters with the exception that there is a liquid nutrient medium continuously recirculating through the column. To facilitate the recirculation of the liquid phase, rigid synthetic media is used as the packing medium. Microorganisms grow primarily as a fixed film on inert packing media but may also be present in the liquid phase because they can both grow suspended in the liquid phase and because the flowing liquid imparts sufficient force to detach biomass from the solid support media. Contaminants are transferred from the air stream into the liquid phase and bio-film for subsequent degradation.

Potential disadvantages of bio-trickling filter operations include: clogging of the pore space if the filter is treating high VOC loads or if the filter is provided excess nutrients, and the need to manage the liquid stream. An additional disadvantage is that bio-trickling filters may have more difficulty treating poorly soluble compounds since the specific surface area in bio-trickling filters is generally lower.

(3) Bio-Scrubbers

Bio-scrubbers combine physical and chemical treatment with a biological treatment in two separate reactors. In the first reactor, the contaminated air stream is contacted with water in a reactor packed with inert media, resulting in contaminant transfer from the air phase to the liquid phase. The liquid is then directed into an activated sludge reactor where the contaminants are biologically degraded. The separated activated sludge tank allows the

reactor to treat higher concentrations of compounds than bio-filters can handle. In addition since compound transfer and degradation occur in separate reactors, optimization of each reactor can take place separately. As with bio-trickling filters, bio-scrubbers offer greater operator control over nutrient supply, acidity, and the build-up of toxic by-products.

A potential disadvantage of bio-scrubbers is that slower growing microorganisms may be washed out of the system and disposal of excess sludge is required.

(f) Absorption

Absorption is a commonly-applied operation in chemical processing that is used as a raw material or product recovery technique in the separation and purification of gaseous streams containing high concentrations of organics. In absorption, the organics in the gas stream are dissolved in a liquid. The contact between the absorbing liquid and the gas stream is accomplished in counter current spray towers, scrubbers, or packed or plate columns. The resulting material from the absorption cycle must be treated or disposed once the solution reaches its saturation point. The scrubbing liquid containing the contaminant is typically regenerated in a stripping column in conditions of elevated temperature or reduced pressure (vacuum conditions). The contaminant is then recovered using a condenser.

Step Two: Eliminate Technically Infeasible Control Options

To be considered technically feasible, a control technology must either be successfully demonstrated on a unit or, if not demonstrated, then be "available and applicable". A technology is considered "available" if it can be obtained by the applicant through commercial channels. An available technology is considered "applicable" if it can reasonably be installed and operated on the unit in question.

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of carbon adsorption and condensation are not technically feasible options for this source for the following reasons:

- (a) Based on the information reviewed for this BACT determination, the use of catalytic oxidation is not technically feasible. Due to the variety of refinishing operations undertaken and the variety of planes refinished, a wide variety of associated materials is required (i.e. stripping solutions, surface cleaners, surface treatments, primers, topcoats and solvents). Many of the chemical constituents in these materials will foul the catalyst bed rendering it ineffective in enhancing the destruction of VOC in the oxidizer.
- (b) Based on the information reviewed for this BACT determination, the use of condensation systems is not technically feasible. Condensation systems are used for very low volume, high VOC concentrations (up to 100%), such as those from gasoline tank transfer or chemical manufacturing process operations. The airflow of the source is a high volume, low concentration exhaust and therefore excludes condensation as an option.
- (c) Based on the information reviewed for this BACT determination, the use of absorption is not technically feasible. The low VOC concentration in the exhaust gas from the REFINISH operation would result in poor solubility of VOC in an absorber media.

The following table summarizes other BACT determinations at similar sources or for similar processes that were identified in the EPA's RACT/BACT/LAER Clearinghouse (RBLCL) under Process Type Code 41.001 (Aerospace Surface Coating), as well as IDEM, OAQ permits issued to date:

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
BOEING Commercial Airplane Group - Renton  Renton, WA	2008	Paint Booth / Hangar	None	41.80 tons per twelve (12) consecutive months	RBLC ID No. WA-0344  WA State Dept. of Ecology Permit No. PSD 08-01
The BOEING Company - BOEING Everett  Everett, WA	2007	Paint Hangar  Final Exterior Coating	None	412 tons per twelve (12) consecutive months	RBLC ID No. WA-0340  WA State Dept. of Ecology Permit No. PSD 06-04
BOEING Commercial Airplane Group  Everett, WA	2005	Final Assembly  Exterior Coating Operations	None	Final Assembly = 49.0 tons per twelve (12) consecutive months  Exterior Coating Operations = 412 tons per twelve (12) consecutive months	RBLC ID No. WA-0326  WA State Dept. of Ecology Permit No. PSD 05-02
BOEING Commercial Airplane Group - BOEING Everett  Everett, WA	2005	Paint Hangar  Final Exterior Coating	None	*BACT review was not required.  No change to those identified in RBLC ID No. WA-0326	RBLC ID No. WA-0330  WA State Dept. of Ecology Permit No. PSD-05-02
BOEING Commercial Airplant Group - Everett Plant  Everett, WA	2005	Painting	None	*Identified as a draft determination in the RBLC. No information was contained in the RBLC listing.	RBLC ID No. WA-0341  WA State Dept. of Ecology Permit No. 91-06 Amendment 2

Step Three: Rank Remaining Control Technologies by Control Effectiveness

The remaining technically feasible options for controlling VOC emissions from the aircraft refinishing operation are as follows (listed in descending order of most technically feasible):

Options for VOC Control	Control Efficiency (%)
Thermal Oxidizer	98%
Carbon Adsorption	95%
Bio-Filtration	95%

Step Four: Evaluate Top Control Alternatives

Further evaluation including economic, energy and environmental impacts are required for controlling VOC emissions from aircraft refinishing operations. Annualized costs were determined in accordance with the EPA guidance (EPA's Office of Air Quality Planning and Standards Control Cost Manual), with other relevant information provided by the respective equipment vendors, inputs from plant personnel, and engineering judgment.

Pursuant to Section IV.D.2.c of EPA's BACT Guidance Document, costs that are within the range of normal costs for a control method may be reviewed in comparison to similar sources. This comparison may allow for the elimination of a technologically- and otherwise economically-feasible control option, provided that the costs of pollutant removal for the subject source are unduly high when compared to the costs borne by sources in recent BACT determinations.

The technologically-feasible options for controlling VOC emissions from the aircraft refinishing operations and the costs estimated for Dean Baldwin Painting, LP to purchase and operate each control method are summarized in Appendix C. The cost effectiveness for similar controls at similar facilities are not available for comparison for the aircraft refinishing operations because there were no records readily available where control devices have been known to be implemented for VOC control for aircraft refinishing operations.

Control Device Option	Control Efficiency	Estimated Capital Costs	Estimated Annualized Costs	Estimated VOC Controlled (tons/year)	Cost Effectiveness (\$/ton)
Regenerative Thermal Oxidizer (RTO)	98%	\$60,828,786	\$28,426,874	301.90	\$94,160
Carbon Adsorption	95%	\$9,451,640	\$109,474,345	292.66	\$374,040
Bio-Filtration	95%	\$25,760,000	\$7,840,000	292.66	\$26,789

- (a) Based on the information presented in Appendix C, and summarized above, it would be economically infeasible to control the emissions from the proposed aircraft refinishing operation via regenerative thermal oxidation at a cost of \$94,160 per ton of VOC removed.

Based on discussions with RTO manufacturers, the most effective RTO unit is capable of handling 60,000 acfm. Dean Baldwin Painting, LP's Grissom Aeroplex aircraft refinishing operations require thirty-six (36) discharge fans/stacks at 30,000 acfm per fan and two (2) discharge fans at 20,000 acfm per fan for a total of 1,120,000 acfm of discharge air. Therefore, approximately eighteen (18) RTO units (60,000 acfm each) would be required to control the emissions from the REFINISH operation.

- (b) Based on the information presented in Appendix C, and summarized above, it would be economically infeasible to control the emissions from the proposed aircraft refinishing operation via carbon adsorption at a cost of \$374,040 per ton of VOC removed.

The most effective carbon adsorption unit is capable of handling 60,000 acfm. Dean Baldwin Painting, LP's Grissom Aeroplex aircraft refinishing operations require thirty-six (36) discharge fans/stacks at 30,000 acfm per fan and two (2) discharge fans at 20,000 acfm per fan for a total of 1,120,000 acfm of discharge air. Therefore, approximately eighteen (18) carbon adsorber units (60,000 acfm each) would be required to control the emissions from the REFINISH operation.

- (c) Based on the information reviewed in this BACT determination, it would be economically infeasible to control the emissions from the proposed aircraft refinishing operation via bio-filtration at a cost of \$26,789 per ton of VOC removed.

Costs associated with controlling the aircraft refinishing operations via bio-filtration were estimated based on information provided in the Air Force Research Laboratory report AFRL-ML-TY-TR-2004-4557 "Optimization of an Innovative Bio-filtration System As a VOC Control Technology For Aircraft Painting Facilities", that was prepared under contract to the Department of Defense (DOD) Strategic Environmental Research and Development Program (SERPD).

The report provided results from two case studies for controlling potential VOC emissions from aircraft coating operations via bio-filtration. The first study looked at a small scale bio-filtration device capable of handling 4,000 scfm. The second case study looked at a larger scale bio-filtration device capable of handling 40,000 scfm. The design parameters and cost estimates for the bio-filtration treatment options are identified below:

<b>Parameter</b>	<b>Case Study 1 (4,000 scfm)</b>	<b>Case Study 2 (40,000 scfm)</b>
Gas-Phase Residence Time (sec)	36	15
Bioreactor Volume (ft <sup>3</sup> )	3,060	12,750
Cost Vessel / ft <sup>2</sup> vessel area	100	100
Packing Media Cost (\$/ft <sup>3</sup> )	\$15	\$15
Modular Bioreactor Footprint	18 ft x 18ft	38 ft x 38ft
Bioreactor Packed-Bed Height (ft)	9	9
Total Annualized Cost (TAC)	\$84,737	\$281,644
Total Capital Investment (TCI)	\$239,703	\$924,771
TAC/scfm	\$21	\$7
TCI/scfm	\$60	\$23

Operating Costs for the bio-filtration option include the costs for nutrients, water, power, and maintenance personnel. During this case study (2004) it was assumed that the maintenance labor cost would equal \$40,000 annually.

Dean Baldwin Painting, LP's Grissom Aeroplex aircraft refinishing operations require thirty-six (36) discharge fans/stacks at 30,000 acfm per fan and two (2) discharge fans at 20,000 acfm per fan for a total of 1,120,000 acfm of discharge air. Therefore, approximately twenty-eight (28) bio-filtration units (40,000 acfm each) would be required to control the emissions from the REFINISH operation. It was assumed that the scfm and acfm were equal for the purpose of this estimation.

The source proposes that requiring add-on controls for the aircraft refinishing operation would place them at a significant economic disadvantage in the aircraft coating industry. The source proposes to reduce emissions through operational and work practice standards.

#### Step Five: Select BACT

IDEM, OAQ has determined that the following requirements represent BACT for the aircraft refinishing operations at the source:

- (a) The following management and work practices shall apply to the REFINISH operation:
  - (1) VOC emissions from primers shall be limited to a VOC content level of no more than: 540 g/L (4.5 lb/gal) of primer (less water and exempt solvents), as applied, and as determined on a monthly volume-weighted average.
  - (2) VOC emissions from topcoats shall be limited to a VOC content level of no more than: 540 g/L (4.5 lb/gal) of coating (less water and exempt solvents) as applied and as determined on a monthly volume-weighted average. VOC emissions from self-priming topcoats shall be limited to a VOC content level of no more than: 540 g/L (4.5 lb/gal) of self-priming topcoat (less water) as applied, and as determined on a monthly volume-weighted average.
  - (3) Place used solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent
  - (4) Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers
  - (5) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills

- (6) Clean spray guns by one of the following methods:
  - (A) Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun. If electing to clean spray guns by this method, the Permittee shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system, while the system is in operation, at least once per month. If leaks are found during the monthly inspection, repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed, and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued;
  - (B) Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use;
  - (C) Disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components;
  - (D) Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions; or
  - (E) Empty the used cleaning solvent each time aerospace parts or assemblies, or components of a coating unit (with the exception of spray guns) are flush cleaned into an enclosed container or collection system that is kept closed when not in use or into a system with equivalent emission control.
- (7) All primers and topcoats (including self-priming topcoats) shall be applied using one or more of the application techniques specified below:
  - (A) Flow/curtain coat application;
  - (B) Dip coat application;
  - (C) Roll coating;
  - (D) Brush coating;
  - (E) Cotton-tipped swab application;
  - (F) Electrodeposition (dip) coating;
  - (G) High volume low pressure (HVLP) spraying;
  - (H) Electrostatic spray application; or
  - (I) Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods.
- (8) All application devices used to apply primers or topcoats (including self-priming topcoats) shall be operated according to company procedures, local specified operating procedures,

and/or the manufacturer's specifications, whichever is most stringent, at all times.  
Equipment modified by the facility shall maintain a transfer efficiency equivalent to HVLP  
and electrostatic spray application techniques.

Compliance with the above limits and conditions will satisfy the requirements of 326 IAC 8-1-6 (BACT).

<b>IDEM Contact</b>
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Questions regarding this BACT Analysis can be directed to Jason R. Krawczyk at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.

**Appendix C: RTO Cost Analysis for  
Controlling the Aircraft Refinishing Operation**

**Company Name:** Dean Baldwin Painting, LP  
**Address City IN Zip:** 2075 North Hoosier Boulevard, Peru, IN 46971  
**Permit Number:** 103-30549-00046  
**Plt ID:** 103-00046  
**Reviewer:** Jason R. Krawczyk  
**Date:** May 25, 2011

Items	Cost Factor	Cost Estimates
<b>Purchased Equipment Costs</b>		
Equipment Costs	As Quoted	\$1,266,200.00
Instrumentation & Controls	As Quoted	\$428,000.00
Sales Tax	7% - Indiana	\$118,594.00
Freight	As Quoted	\$60,000.00
		<u>\$1,872,794.00</u>
<b>Direct Installation Costs</b>		
Foundations & Supports	As Quoted	\$79,800.00
Auxiliaries	As Quoted	\$70,100.00
Rigging & Erection	As Quoted	\$126,000.00
Duct Work	As Quoted	\$682,000.00
Piping	As Quoted	\$70,200.00
Insulation & Paintings	As Quoted	\$60,000.00
Electrical	As Quoted	\$135,000.00
		<u>\$1,223,100.00</u>
<b>Indirect Installation Costs</b>		
Engineering	As Quoted	\$87,000.00
Contractor & Field Expenses	As Quoted	\$68,300.00
Startup & Commissioning	As Quoted	\$42,000.00
Performance Testing	As Quoted	\$30,000.00
Contingencies	As Quoted	\$56,183.00
		<u>\$283,483.00</u>

<b>Total Capital Costs (60,000 acfm unit):</b>	<b>\$3,379,377.00</b>
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<b>Direct Operating Costs (Annual)</b>		
Natural Gas	\$.80 per Therm	\$364,415.28
Electricity	\$.065 per KWH	\$254,863.38
Operator Labor	500 Hrs @ \$25/ hr	\$12,500.00
Supervisor Labor	15% of Operator Labor	\$1,875.00
Maintenance Labor	950 Hrs @ \$40/hr	\$38,000.00
Maintenance Consumables	50% of Maint Labor	\$19,000.00
Systems Specialist	30% Annual Salary	\$41,000.00
Replacement Parts	Annual - Estimated	\$27,000.00
Media Replacement	Annual	\$72,000.00
Air Sample Collection & Testing	Annual	\$17,500.00
Duct Cleaning	Annual	\$15,000.00
		<u>\$863,153.66</u>

<b>Indirect Operating Costs (Annual)</b>		
Overhead	60% of labor costs, 10% Parts	\$65,925.00
Property Tax	2.5% capital cost	\$84,484.43
Insurance	1% Capital Cost	\$33,793.77
Administration	1.5% Capital Cost	\$50,690.66
Capital Recovery Cost	*0.1424 (7%/10yrCRF)	\$481,223.28
		<u>\$716,117.13</u>

<b>Net Annualized Costs (60,000 acfm unit)</b>	<b>Direct &amp; Indirect Operating</b>	<b>\$1,579,270.79</b>
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Per RTO manufacturers, the most effective per unit size is about 60,000 acfm.  
 The Dean Baldwin Painting, LP Grissom Aeroplex aircraft refinishing operations requires 36 discharge fans/stacks at 30,000 acfm per fan and 2 discharge fans at 20,000 acfm per fan for a total of 1,120,000 acfm of discharge air.  
 Therefore, approximately 18 RTO units (60,000 acfm each) would be required.

<b>Net Annualized Costs (Eighteen units)</b>	<b>Direct &amp; Indirect Operating</b>	<b>\$28,426,874.23</b>
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<b>Cost Per ton to control @ 98% VOC Removal</b>	<b>301.90</b>	<b>\$94,160.28</b>
	<b>(Tons Removed)</b>	

RTO Destruction Efficiency =	98%
Uncontrolled VOC Emissions (ton/yr) =	308.06
Controlled VOC Emissions (ton/yr) =	6.16

**Appendix C: Carbon Adsorption Cost Analysis for  
Controlling the Aircraft Refinishing Operation**

**Company Name:** Dean Baldwin Painting, LP  
**Address City IN Zip:** 2075 North Hoosier Boulevard, Peru, IN 46971  
**Permit Number:** 103-30549-00046  
**Pit ID:** 103-00046  
**Reviewer:** Jason R. Krawczyk  
**Date:** May 25, 2011

Items	Cost Factor	Cost Estimates
<b>Purchased Equipment Costs</b>		
Equipment Costs	As Quoted	\$6,800,000
Instrumentation & Controls	As Quoted	\$400,000
Sales Tax	7% - Indiana	\$504,000
Freight	As Quoted	\$60,000
		<u>\$7,764,000</u>

<b>Direct Installation Costs</b>		
Foundations & Supports	As Quoted	\$223,440
Auxiliaries	As Quoted	\$30,000
Rigging & Erection	As Quoted	\$158,000
Duct Work	As Quoted	\$682,000
Piping	As Quoted	\$70,200
Insulation & Paintings	As Quoted	\$50,000
Electrical	As Quoted	\$185,000
		<u>\$1,398,640</u>

<b>Indirect Installation Costs</b>		
Engineering	As Quoted	\$94,000
Contractor & Field Expenses	As Quoted	\$65,000
Startup & Commissioning	As Quoted	\$50,000
Performance Testing	As Quoted	\$30,000
Contingencies	As Quoted	\$50,000
		<u>\$289,000</u>

<b>Total Capital Costs:</b>	<b>\$9,451,640</b>
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<b>Direct Operating Costs (Annual)</b>		
Electricity	\$.065 per KWH	\$182,813
Operator Labor	500 Hrs @ \$25/ hr	\$12,500
Supervisor Labor	15% of Operator Labor	\$1,875
Maintenance Labor	950 Hrs @ \$40/hr	\$38,000
Maintenance Consumables	50% of Maint Labor	\$19,000
Systems Specialist	30% Annual Salary	\$41,000
Replacement Parts	Annual - Estimated	\$27,000
Media Replacement	Annual Carbon Change	\$3,500,000
Air Sample Collection & Testing	Annual	\$17,500
Duct Cleaning	Annual	\$15,000
		<u>\$3,854,688</u>

<b>Indirect Operating Costs (Annual)</b>		
Overhead	60% of labor costs, 10% Parts	\$408,725
Property Tax	2.5% capital cost	\$236,291
Insurance	1% Capital Cost	\$94,516
Administration	1.5% Capital Cost	\$141,775
Capital Recovery Cost	*0.1424 (7%/10yrCRF)	\$1,345,914
		<u>\$2,227,221</u>

<b>Net Annualized Costs</b>	Direct & Indirect Operating	<b>\$6,081,908</b>
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The most effective per unit size is about 60,000 acfm.  
 The Dean Baldwin Painting, LP Grissom Aeroplex aircraft refinishing operations requires 36 discharge fans/stacks at 30,000 acfm per fan and 2 discharge fans at 20,000 acfm per fan for a total of 1,120,000 acfm of discharge air.  
 Therefore, approximately 18 carbon adsorber units (60,000 acfm each) would be required.

<b>Net Annualized Costs (Eighteen units)</b>	Direct & Indirect Operating	<b>\$109,474,345</b>
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<b>Cost Per ton to control @ 95% VOC Removal</b>	<b>292.66</b>	<b>\$374,070</b>
	<b>(Tons Removed)</b>	

Carbon Adsorber Capture Efficiency =	95%
Uncontrolled VOC Emissions (ton/yr) =	308.06
Controlled VOC Emissions (ton/yr) =	15.40



# 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: Barbara Baldwin  
Dean Baldwin Painting  
2395 Bulverde Rd, Ste 105  
Bulverde, TX 78163

DATE: September 21, 2011

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

SUBJECT: Final Decision  
New Source FESOP  
103 - 30549 - 00046

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

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

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

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

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**Commissioner**

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Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

September 21, 2011

TO: Peru Public Library 102 East Main Peru IN

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

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

**Applicant Name: Dean Baldwin Painting**  
**Permit Number: 103 - 30549 - 00046**

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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