



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 13, 2012

RE: CMW, Inc. / 097-30555-00297

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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**Minor Source Operating Permit
OFFICE OF AIR QUALITY**

**CMW Inc
70 South Gray Street
Indianapolis, Indiana 46201**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

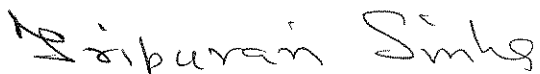
Operation Permit No.: M 097-30555-00297	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: March 13, 2012 Expiration Date: March 13, 2022

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metals welding operation with processes including: silver extrusion, metal powder mixing, powder pressing, sintering, metal machining, cold heating, cleaning, and degreasing..

Source Address:	70 South Gray Street, Indianapolis, Indiana 46201
General Source Phone Number:	(317) 634-8884
SIC Code:	3356; 3548; 3643
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Minor Source, under Nonattainment NSR for PM2.5 Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) one hundred fifty (150) gallon parts washer and three (3) eighty (80) gallon parts washers that utilize a solvent based cleaner, each with a potential usage of 145 gallons/year. The 150 gallon parts washer was constructed in July of 2011, one of the 80 gallon parts washers was constructed in April of 2011, and the other two 80 gallon parts washers were constructed in December of 2011.
- (b) One (1) twenty (20) gallon parts washer and two (2) eighty (80) gallon parts washers all constructed in 2010 each utilizing a solvent based cleaner with a potential usage of 145 gallons/year.. [326 IAC 8-3-2] [326 IAC 8-3-5].
- (c) Two (2) 16-gallon and one (1) 30 gallon manual sink-on-a drum parts washers constructed in 2010 utilizing a solvent based cleaner each with a potential usage of 145 gallons/year.. [326 IAC 8-3-2] [326 IAC 8-3-5].

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

- (d) One (1) natural gas-fired boiler with heat input equal to or less than ten million (10,000,000) British thermal units per hour, identified as, Process boiler, constructed in 2008 with and having a maximum capacity of 2.2 million Btu per hour.
- (e) One (1) natural gas-fired boiler with heat input equal to or less than ten million (10,000,000) British thermal units per hour, identified as, Heating boiler, constructed in 2008 with and having a maximum capacity of 2.0 million Btu per hour.

- (f) Grinding and Machining operations, identified as EU2 – 7 and EU10 – 34. Emissions units EU2 - 7 were constructed prior to March 1984, controlled by a single baghouse, and exhausting at one stack, identified as stack SV2. Emission units EU10 – 34 were constructed prior to September 1990, controlled by a single cyclone and exhausting at one stack, identified as stack SV4.
- (g) Two (2) material mixing drying ovens, identified as EU-8A, constructed prior to 1970, and EU-8B, constructed in 2007, used to dry out N-Butyl Acetate from the metal powder after mixing. The maximum powder mixing capacity from the two ovens is 230,103 pounds per year.
- (h) Soldering and Welding operations
- (i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Natural gas-fired space heater, process heater for office heaters using the hour.
 - (2) Small natural gas-burners (associate with heat treatment similar to pilot lights)

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M 097-30555-00297, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (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.The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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 Permittee shall implement the PMPs.

- (c) 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.
- (d) 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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M 097-30555-00297 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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 permitted 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.18 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required

monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (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

C.13 Response to Excursions or Exceedances

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

- (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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of 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

- (b) 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.
- (c) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) natural gas-fired boiler with heat input equal to or less than ten million (10,000,000) British thermal units per hour, identified as, Process boiler, constructed in 2008 with and having a maximum capacity of 2.2 million Btu per hour.
- (b) One (1) natural gas-fired boiler with heat input equal to or less than ten million (10,000,000) British thermal units per hour, identified as, Heating boiler, constructed in 2008 with and having a maximum capacity of 2.0 million Btu per hour.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate emissions from the two (2) natural gas boilers, both constructed in 2008, identified as Process Boiler, heat input capacity of 2.2 MMBtu/hr and Heating Boiler, heat input capacity of 2.0 MMBtu/hr, shall not exceed 0.6 pounds per million BTU.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) one hundred fifty (150) gallon parts washer and three (3) eighty (80) gallon parts washers that utilize a solvent based cleaner, each with a potential usage of 145 gallons/year. The 150 gallon parts washer was constructed in July of 2011, one of the 80 gallon parts washers was constructed in April of 2011, and the other two 80 gallon parts washers were constructed in December of 2011.
- (b) One (1) twenty (20) gallon parts washer and two (2) eighty (80) gallon parts washers all constructed in 2010 each utilizing a solvent based cleaner with a potential usage of 145 gallons/year.. [326 IAC 8-3-2] [326 IAC 8-3-5].
- (c) Two (2) 16-gallon and one (1) 30 gallon manual sink-on-a drum parts washers constructed in 2010 utilizing a solvent based cleaner each with a potential usage of 145 gallons/year.. [326 IAC 8-3-2] [326 IAC 8-3-5].

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

- (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	CMW Inc
Address:	70 South Gray Street
City:	Indianapolis, Indiana 46201
Phone #:	(317) 634-8884
MSOP #:	M 097-30555-00297

I hereby certify that CMW Inc is :

still in operation.

I hereby certify that CMW Inc is :

no longer in operation.

in compliance with the requirements of MSOP M 097-30555-00297.

not in compliance with the requirements of MSOP M 097-30555-00297.

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

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

Noncompliance:

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100 TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Title V Transitioning to a Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	CMW Inc.
Source Location:	70 South Gray Street, Indianapolis, Indiana 46201
County:	Marion
SIC Code:	3643, 3356, 3548
Operation Permit No.:	097-30555-00297
Permit Reviewer:	Anh Nguyen

On May 16, 2011, the Office of Air Quality (OAQ) received an application from CMW Inc. related to the transition of a Title V to a MSOP.

Existing Approvals

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

- (a) Administrative Amendment No. 097-28579-00297, issued on November 06, 2009

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

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .	

- (a) Ozone Standards
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality

Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by CMW Inc. on May 16, 2011, relating to relating to a stationary metals welding operation with processes including: silver extrusion, metal forming brazing, metal powder mixing, powder pressing, sintering, metal machining, cold heading, cleaning, and degreasing.

CMW Inc. has applied to make a transition from Title V to MSOP. CMW has been operating under Title V operating permit No. T 097-23694-0029 issued on February 16, 2007. In October, 2011 CMW Inc. removed their conveyORIZED vapor degreaser, identified as EU9 and the source's potential to emit is now less than the major source threshold. In addition to the removal of the vapor degreaser and all of its applicable conditions, the requirements of 40 CFR Part 63, Subpart T have also been removed from the permit.

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

- (a) One (1) one hundred fifty (150) gallon parts washer and three (3) eighty (80) gallon parts washers that utilize a solvent based cleaner, each with a potential usage of 145 gallons/year. The 150 gallon parts washer was constructed in July of 2011, one of the 80 gallon parts washers was constructed in April of 2011, and the other two 80 gallon parts washers were constructed in December of 2011.
- (b) One (1) twenty (20) gallon parts washer and two (2) eighty (80) gallon parts washers all constructed in 2010 each utilizing a solvent based cleaner with a potential usage of 145 gallons/year.. [326 IAC 8-3-2] [326 IAC 8-3-5].
- (c) Two (2) 16-gallon and one (1) 30 gallon manual sink-on-a drum parts washers constructed in 2010 utilizing a solvent based cleaner each with a potential usage of 145 gallons/year.. [326 IAC 8-3-2] [326 IAC 8-3-5].

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

- (d) One (1) natural gas-fired boiler with heat input equal to or less than ten million (10,000,000) British thermal units per hour, identified as, Process boiler, constructed in 2008 with and having a maximum capacity of 2.2 million Btu per hour.
- (e) One (1) natural gas-fired boiler with heat input equal to or less than ten million (10,000,000) British thermal units per hour, identified as, Heating boiler, constructed in 2008 with and having a maximum capacity of 2.0 million Btu per hour.
- (f) Grinding and Machining operations, identified as EU2 – 7 and EU10 – 34. Emissions units EU2 - 7 were constructed prior to March 1984, controlled by a single baghouse, and exhausting at one stack, identified as stack SV2. Emission units EU10 – 34 were constructed prior to September 1990, controlled by a single cyclone and exhausting at one stack, identified as stack SV4.
- (g) Two (2) material mixing drying ovens, identified as EU-8A, constructed prior to 1970, and EU-8B, constructed in 2007, used to dry out N-Butyl Acetate from the metal powder after mixing. The maximum powder mixing capacity from the two ovens is 230,103 pounds per year.
- (h) Soldering and Welding operations
- (i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Natural gas-fired space heater, process heater for office heaters using the hour.
 - (2) Small natural gas-burners (associate with heat treatment similar to pilot lights)

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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	2.01
PM10 ⁽¹⁾	2.19
PM2.5	2.19
SO ₂	0.03
NO _x	2.94
VOC	44.44
CO	2.47
GHGs as CO ₂ e	3599

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Single HAP	0.14
TOTAL HAPs	0.14

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Boilers	0.03	0.14	0.14	0.02	1.80	0.10	1.51	2221.00	0.00	0.00
Natural Gas Combustion Units	0.02	0.09	0.09	0.01	1.14	0.06	0.96	1378.00	0.00	0.00
Parts Washers	0.00	0.00	0.00	0.00	0.00	3.61	0.00	0.00	0.00	0.00
Mat.Mixing Dry Oven	1.15	1.15	1.51	0.00	0.00	39.37	0.00	0.00	0.02	0.02
Soldering Operations	0.004	0.004	0.004	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Machining Operations	0.81	0.81	0.81	0.00	0.00	1.30	0.00	0.00	0.12	0.12
Total PTE of Entire Source	2.01	2.19	2.19	0.03	2.94	44.44	2.47	3599.00	0.14	0.14
Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
 **The 100,000 CO₂e 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.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40c, Subpart Dc, (326 IAC 12), are not included in the permit; because, the capacity of each of the two (2) insignificant boilers are less than 10 million British thermal units per hour.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63.11514, Subpart XXXXXX), because they are not primarily engaged in operations of manufacturing fabricated metal products (SIC code 3499), which is one of the nine source categories listed in 40 CFR 63.11514. The welding stations are not subject to the requirements of Subpart XXXXXX because they use materials that does not contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP) (compounds of cadmium, chromium, lead, manganese, and nickel).

Compliance Assurance Monitoring (CAM)

- (b) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source

thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all regulated pollutants are less than 100 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
The source is not a major source for Nonattainment New Source Review because PM_{2.5} is emitted at less than 100 tons per year.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, any units in this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2).
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5-1 does not apply.
- (h) 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.
- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 - (1) The grinding and machining operations identified as EU2 – 7 and EU10 – 34 have an uncontrolled PTE of 0.13 lbs/hr and 0.05 lbs/hr respectively. Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 lbs/hr are exempt from this rule. Therefore, 326 IAC 6-3 does not apply.
 - (2) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) from the soldering and welding operations have an uncontrolled PTE of 0.009 lbs/hr. Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 lbs/hr are exempt from this rule. Therefore, 326 IAC 6-

3 does not apply.

- (j) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The boilers are subject to 326 IAC 6-2-4 because the 2.2 MMBtu/hr boiler identified as Process Boiler and the 2.0 MMBtu/hr boiler identified as Heating Boiler were constructed after September 21, 1983. This limitation is based on the following equation:

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

Where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.
Q = 2.2 + 2.0 = 4.2 MMBtu/hr

$$Pt = 0.75 \text{ lbs/MMBtu}$$

326 IAC 6-2-4(a) total source maximum operating capacity rating is less than 10 MMBtu/hr, therefore, particulate emissions shall be limited to 0.60 pounds per MMBtu,

Natural Gas Combustion Units

- (k) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired heaters, and natural gas-burner are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.
- (l) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired combustion units are 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.
- (m) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This natural gas-fired units are not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas-fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.
- (n) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
(1) The unlimited VOC potential emissions from the part washer degreasers, identified as four (4) solvent-based cleaners constructed in 2011, three (3) water-based cleaners constructed in 2011, and three (3) manual sink-on-a-drum constructed in 2010 are less than twenty-five (25) tons per year for each unit and because they are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control). Therefore, the requirements of 326 IAC 8-1-6 do not apply.
(2) The natural gas-fired combustion units are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because they each have the potential to emit VOC of less than twenty-five (25) tons per year.
(3) Two (2) material mixing drying oven, identified as EU-8A and EU-8B do not have the potential to emission of twenty- five (25) tons or more per year each. Therefore, 326 IAC 8-1-6 does not apply.
- (o) 326 IAC 8-3-2 (Cold Cleaner Operations)
(1) The insignificant part washers; identified as four (4) solvent based cleaners constructed in 2011, and three (3) manual sink-on-a-drum constructed in 2010 are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) because it was constructed

after January 1, 1980 and it performs organic solvent degreasing operations.

- (2) The three (3) water base part washers are exempt from the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) because the washers are water-based cleaner.
- (p) 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)
 - (1) The insignificant part washers; identified as one four (4) solvent base cleaners constructed in 2011, and three (3) manual sink-on-a-drum parts cleaners constructed in 2010 were all constructed after July 1, 1990 and are located at a source in Marion County. Pursuant to 326 IAC 8-3-1(b)(2), the insignificant degreasers are subject to the requirements of 326 IAC 8-3-5. However, the control requirements are exempt due to low vapor pressure of the cleaners
 - (2) The three (3) water base part washers are exempt from the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) because the washers are water-based cleaner.

Compliance Determination, Monitoring and Testing Requirements

Testing Requirements

There were no stack tests required by the Part 70 Operating Permit, and none have been performed or are required by the MSOP.

Compliance Requirements

There is no new Compliance Determination or Compliance Monitoring Requirements applicable to this source

IDEM has made the following changes throughout the permit. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Change 1: The source requested changes made to the following listing in A.3 and to clarify the operation of the ovens description IDEM believes that the term material mixing drying oven should replace the metal powder drying since there is no metal powder spray or booth in this process.

- (g) ~~One (1) metal powder drying oven, identified as EU8, used to dry out N-Butyl Acetate from the metal powder after mixing. The maximum powder mixing capacity is 12.17 pounds per hour (lbs/hr) with N-Butyl Acetate added to the powder at a ratio of 0.0215 pounds per one (1) pound of metal powder.~~
Two (2) material mixing drying ovens, identified as EU-8A, constructed prior to 1970, and E-8B, constructed in 2007, used to dry out N-Butyl Acetate from the metal powder after mixing. The maximum powder mixing capacity from the two ovens is 230,103 pounds per year.

Change 2: The following parts washer: four (4) solvent based cleaners in 2011, three water based cleaners, and three (3) manual sink on a drum in 2010 are now incorporated into Section A.2 and Section D.2. Emissions units are now enumerated consistently between section A and D.

- (a) **One (1) one hundred fifty (150) gallon parts washer and three (3) eighty (80) gallon parts washers that utilize a solvent based cleaner, each with a potential usage of 145 gallons/year. The 150 gallon parts washer was constructed in July of 2011, one of the 80 gallon parts washers was constructed in April of 2011, and the other two 80 gallon parts washers were constructed in December of 2011.**
- (b) **One (1) twenty (20) gallon parts washer and two (2) eighty (80) gallon parts**

washers all constructed in 2010 each utilizing a solvent based cleaner with a potential usage of 145 gallons/year.. [326 IAC 8-3-2] [326 IAC 8-3-5].

- (c) **Two (2) 16-gallon and one (1) 30 gallon manual sink-on-a drum parts washers constructed in 2010 utilizing a solvent based cleaner each with a potential usage of 145 gallons/year.. [326 IAC 8-3-2] [326 IAC 8-3-5].**
- ~~(a) Two (2) eighty (80) gallon parts washers and one (1) twenty gallon parts washer (Crystal Clean Odorless Solvent) all constructed in October 2010 that utilize a water-based cleaner.~~
- ~~(b) One (1) fifty (50) gallon parts washer (Mirachem M2750 Cleaner/Degreaser) constructed April of 2011 utilize a solvent based cleaner. Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]~~
- ~~(c) Three (3) 16 gallon manual sink on a drum parts washers (Crystal Clean 142 Mineral Spirits) constructed in 2010 utilizing a solvent based cleaner. Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]~~

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 16, 2011

The operation of this source shall be subject to the conditions of the attached proposed Title 5 Transitioning to a MSOP No. 097-30555-00297. The staff recommends to the Commissioner that this New Source Review *and* MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Anh Nguyen 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) (233-5334) or toll free at 1-800-451-6027 extension (35334).
- (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

**CMW INC.
EMISSIONS INVENTORY SUMMARY**

Appendix A: Emission Calculations

TSD App A, Page 1 of 7

SUMMARY OF CALCULATED POTENTIAL EMISSION RATES - BEFORE CONROLS

Company Name: CMW Inc.
Address City IN Zip: 70 South Gray Street, Indianapolis Indiana 46201
Permit Number: 097-30555-00297
Plt ID: 097--00297
Reviewer: Anh Nguyen
Date: 08/16/11

Emission Unit	Potential Emissions (tons/yr)								
	PM	PM10/PM2.5	NOx	SOx	VOC	CO	CO2e	Single HAP	Total HAPs
2 Natural Gas Boilers	0.03	0.14	1.80	0.02	0.10	1.51	2221.00	0.00	0.00
Natural Gas Combustion Units	0.02	0.09	1.14	0.01	0.06	0.96	1378.00	0.00	0.00
Parts Washers	0.00	0.00	0.00	0.00	3.61	0.00	0.00	0.00	0.00
Material Mixing Dry Ovens	1.15	1.15	0.00	0.00	39.37	0.00	0.00	0.02	0.02
Soldering Operations	0.004	0.004	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Machining Operations	0.81	0.81	0.00	0.00	1.30	0.00	0.00	0.12	0.12
Total	2.01	2.19	2.94	0.03	44.44	2.47	3599.00	0.14	0.14
Major Source Thresholds	N/A	100.00	100.00	100.00	100.00	100.00	100000.00	10.00	25.00

Appendix A: Emission Calculations
Natural Gas Boilers

TSD App A, Page 2 of 7

Company Name: CMW Inc.
Address City IN Zip: 70 South Gray Street, Indianapolis Indiana 46201
Permit Number: 097-30555-00297
Pit ID: 097-00297
Reviewer: Anh Nguyen
Date: 08/16/11

Emission Factors (lb/MMscf)					
PM	PM10	NOx	SOx	VOC	Pb
1.9	7.6	100	0.6	5.5	84

Emission Unit	Annual Fuel Usage (cf)	MMBTU/hr	Potential Emissions (tons/yr)							Actual Emissions (tons/yr)						
			PM	PM10	NOx	SOx	VOC	CO	Pb	PM	PM10	NOx	SOx	VOC	CO	Pb
Process Boiler		2.20	0.02	0.07	0.94	0.01	0.05	0.79	0.00							
Heating Boiler	4,670,000	2.00	0.02	0.07	0.86	0.01	0.05	0.72	0.00	0.004	0.018	0.234	0.001	0.013	0.196	0.000
Total			0.03	0.14	1.80	0.01	0.10	1.51	9.02E-06	0.004	0.018	0.234	0.001	0.013	0.196	1.17E-06

Potential Emissions (tons/yr) = Heat Input Capacity (MMBTU/hr) x 1 MMscf/1020 MMBtu x EF (lb/MMscf) x 8760 hr/yr * 1 ton/2,000 lbs
Actual Emissions (tons/yr) = Annual Fuel Usage (cf) x EF (lb/MMscf) x 1 MMscf/1 x 10⁶ cf x 1 ton/2,000 lbs

Note: Emission Factors are from AP-42, Tables 1.4-1 and 1.4-2.

Heat Input Capacity MMBtu/hr
HHV mmBtu
Potential Throughput MMCF/yr
mmscf

	4.2	1000	36.8
			Greenhouse Gas
Emission Factor in lb/MMcf		CO2 120,000	CH4 2.3 N2O 2.2
Potential Emission in tons/yr		2,208	0
Summed Potential Emissions in tons/yr			2,208
CO2e Total in tons/yr			2,221

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).

Particulate Emission Limitations for Sources of Indirect Heating

Particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

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

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBTU/hr) heat input.

Process Boiler = 2.2 MMBtu/hr
Heating Boiler = 2.0 MMBtu/hr
Q = 4.2 MMBtu/hr

Pt = 0.75 lb/MMBtu

Pursuant to 326 IAC 6-2-4, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

updated 7/11

Appendix A: Emission Calculations
Natural Gas Combustion

Company Name: CMW Inc.
Address City IN Zip: 70 South Gray Street, Indianapolis Indiana 46201
Permit Number: 097-30555-00297
Plt ID: 097-00297
Reviewer: Anh Nguyen
Date: 5/16/2010

Emission Factors (lb/10 ⁶ scf)						
PM	PM10	NOx	SOx	VOC	CO	Pb
1.9	7.6	100	0.6	5.5	84	0.0005

Emission Unit	Annual Fuel Usage (cf)	Hours Operated (hr)	Potential Fuel Usage (cf)	Potential Emissions (tons/yr)							Actual Emissions (tons/yr)						
				PM	PM10	NOx	SOx	VOC	CO	Pb	PM	PM10	NOx	SOx	VOC	CO	Pb
Natural Gas Combustion Units	5,212,300	2,000	22,829,874	0.02	0.09	1.14	0.01	0.06	0.96	5.71E-06	0.00	0.02	0.26	0.00	0.01	0.22	0.00

Emissions (tons/yr) = Fuel Usage (cf) x EF (lb/MMscf) x 1 MMscf/1 x 10⁶ cf x 1 ton/2,000 lbs

Note: Emission Factors are from AP-42, Tables 1.4-1 and 1.4-2.
 Potential Fuel Usage was determined by ratioing actual fuel usage based on actual hours of operation.
 Natural gas combustion units are comprised of heat treat and small radiant heat boxes.

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,370	0	0
Summed Potential Emissions in tons/yr	1,370		
CO2e Total in tons/yr	1,378		

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).

Particulate Emission Limitations for Sources of Indirect Heating

Particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited

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

Where:

- Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
- Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

Process Boiler = 2.2 MMBtu/hr
 Heating Boiler = 2.0 MMBtu/hr
 Q = 4.2 MMBtu/hr

Pt = 0.75 lb/MMBtu

Pursuant to 326 IAC 6-2-4, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

**Appendix A: Emission Calculations
Parts Washers**

Company Name: CMW Inc.
Address City IN Zip: 70 South Gray Street, Indianapolis Indiana 46201
Permit Number: 097-30555-00297
Plt ID: 097-00297
Reviewer: Anh Nguyen
Date: 08/16/11

Material	Density (lb/gal)	wt% VOC	No. Units	Potential Usage (gal/yr)	Actual Usage (gal)	Potential VOC Emissions (tons/yr)	Actual VOC Emissions (tons/yr)
Crystal Clean Odorless Solvent	6.30	100%	4	580	433	1.83	1.36
Crystal Clean 142 Mineral Spirits	7.34	100%	3	435	21	1.60	0.08
Mirachem M2750 Cleaner/Degreaser	8.35	9.95%	3	435	0	0.18	0.00
Total						3.61	1.44

Emissions (tons/yr) = Usage (gal/yr) x Density (lb/gal) x wt% VOC x 1 ton/2,000 lbs

Note: Potential usage is based on the insignificant usage limit of 145 gallons per unit for 12 months.

Appendix A: Emission Calculations
Material Mixing Drying Oven EU-8A & EU-8B

Company Name: CMW Inc.
Address City IN Zip: 70 South Gray Street, Indianapolis Indiana 46201
Permit Number: 097-30555-00297
Plt ID: 097-00297
Reviewer: Anh Nguyen
Date: 08/16/11

Material Mixing Drying Oven

Chemical	Actual Hours of Operation	Actual Usage (gal/yr)	Potential Usage (gal/yr)	Density (lb/gal)	wt% VOC	Potential VOC Emissions (tons/yr)	Actual VOC Emissions (tons/yr)
n-Butyl Acetate	4000	3,600	7,884	7.35	100%	28.97	13.23
Paraloid A101		1,995	4,369	7.93	60%	10.39	4.74
Total						39.37	17.97

Potential VOC Emissions	tons/year
EU-8A	19.68
EU-8B	19.68

Emissions (tons/yr) = Usage (gal/yr) x Density (lb/gal) x wt% VOC x 1 ton/2,000 lbs

Note: Potential usage was determined by scaling actual uage based on the actual hours of operation.

Material	wt% HAP		Actual Usage (lb/yr)	Potential Usage (lb/yr)	Potential Emissions			Actual Emissions		
	% Ni	% Pb			PM/PM10	Ni	Pb	PM/PM10	Ni	Pb
Nickel Powder	100%		3,632	7,955	0.040	0.040	0.000	0.018	0.018	0.000
Molybdenum Metal Powder			2,640	5,782	0.029	0.000	0.000	0.013	0.000	0.000
Silver Powder and Flake	0.50%	0.50%	1,676	3,671	0.018	0.000	9.18E-05	0.008	0.000	0.00004191
Tungsten			91,300	199,947	1.000	0.000	0.000	0.457	0.000	0.000
Tungsten Carbide			1,320	2,891	0.014	0.000	0.000	0.007	0.000	0.000
Copper All Grades			3,841	8,412	0.042	0.000	0.000	0.019	0.000	0.000
Iron			660	1,445	0.007	0.000	0.000	0.003	0.000	0.000
Total Powders			105,070	111,340	1.151	0.040	9.18E-05	0.525	0.018	0.00004191

PM/PM10 Emissions (tons/yr) = Usage (lb/yr) x 1 ton/2,000 lbs x 1% loss

HAP Emissions (tons/yr) = PM/PM10 Emissions (tons/yr) x wt% HAP

Note: Total potential usage is based on the maximum mixing capacity (12.71 lb/hr). Potential individual material usage is a ratio based on actual material usage.

**CMW INC.
EMISSIONS INVENTORY**

Appendix A: Emission Calculations

TSD App A, Page 6 of 7

Soldering

Company Name: CMW Inc.

Address City IN Zip: 70 South Gray Street, Indianapolis Indiana 46201

Permit Number: 097-30555-00297

Pit ID: 097--00297

Reviewer: Anh Nguyen

Date: 08/16/11

WELDING	ELECTRODE CONSUMPTION (LB/YR)	EMISSION FACTORS*		EMISSIONS (lbs/yr)	
		PM = PM10, PM2.5 (lb/10 ³ lb)	P (wt%)	PM = PM10, PM2.5	P
Solder #7	33	5.2	5.00%	0.172	0.01
BR505	24	5.2	0.00%	0.125	0.00
BR560	300	5.2	0.00%	1.560	0.00
ACTIAL EMISSION TOTALS (LB/YR) BASED ON 2000 HOURS				1.856	0.01
POTENTIAL EMISSION TOTALS (LB/YR)				8.131	0.038
POTENTIAL EMISSION TOTALS (TON/YR)				0.004	0.00

METHODOLOGY

PM/PM10 Welding emissions (lb/yr) = lbs of electrode used/yr x Emission Factor (lb/10³ lb electrode consumed)

P Emissions (lb/yr) = PM/PM10 Welding Emissions (lb/yr) x wt% P

Potential Emission Totals (lb/yr) = actual emissions total (lb/yr) based on 2000hrs * 8760 hr/ 2000 hr

Potential Emission Totals (t/yr) = Potential Emission Totals (lb/yr) *1 ton/ 2000 (lb)

Note: PM/PM10 Emission factor from AP-42, Table 12.19-1

wt% P from MSDS

Potential Emissions are determined by scaling up actual emission to 8760 hrs of operation. Actual emissions based on 2,000 hrs/yr.

Because there are no emission factors that have been developed specifically for soldering, it is assumed that those for welding operations can be used to estimate emissions from soldering.

Emissions from the fluxes used at CMW are not included because the fluxes do not contain any VOCs or HAPs.

**Appendix A: Emission Calculations
Part Washers**

Company Name: CMW Inc.
Address City IN Zip: 70 South Gray Street, Indianapolis Indiana 46201
Permit Number: 097-30555-00297
Plt ID: 097-00297
Reviewer: Anh Nguyen
Date: 08/16/11

Dry Machining

Emission Unit	Amount of Dust Collected (lb/yr)	Control Device Efficiency	Actual Hours of Operation	wt% HAP	Potential PM/PM10 Emissions (ton/yr)	Potential HAP Emissions (ton/yr)	Actual Uncontrolled PM/PM10 Emissions (ton/yr)	Actual Uncontrolled HAP Emissions (ton/yr)
EU 2-7	258	99%	2000	14.30%	0.57	0.08	0.13	0.02
EU 10-34	87.6	80%	2000	14.30%	0.24	0.03	0.05	0.01
Total					0.81	0.12	0.19	0.03

Machining Coolants

Material	Density (lb/gal)	wt% VOC	Actual Hours of Operation	Potential Usage (gal/yr)	Actual Usage (gal/yr)	Potential VOC Emissions (tons/yr)	Actual VOC Emissions (tons/yr)
Tech Cool	7.9	15%	2000	2190	500	1.30	0.30
Total						1.30	0.30

Dry Machining

Potential Emissions (ton/yr) = Amount of Dust Collected (lb/yr) x 1/Control Efficiency x 1 ton/2,000 lbs x 8760 (hrs/yr) / Actual Hours of Operation (hr/yr)

Actual Emissions (tons/yr) = Amount of Dust Collected (lb/yr) x 1/Control Efficiency x 1 ton/2,000 lbs

HAP Emissions (tons/yr) = PM/PM10 Emissions (tons/yr) x wt% HAP

Machining Coolants

Emissions (tons/yr) = Usage (gal/yr) x Density (lb/gal) x wt% VOC x 1 ton/2,000 lbs

Note: Amount of Dust Collected data was previously gathered over a year of production (2000 hrs/yr).

The HAP content was chosen as the highest HAP metal that would be machined. It was assumed that all metal machined was the worst-case HAP metal.

There are numerous machining operations at CMW where coolant is used or only large chunks of material are removed from the metal. These units are not considered sources of PM and are, therefore, not included in this inventory.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Cecil Taylor
CMW, Inc.
PO Box 2266
Indianapolis, IN 46206

DATE: March 13, 2012

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

SUBJECT: Final Decision
MSOP
097-30555-00297

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:
Eric Krepps - COO
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.

Final Applicant Cover letter.dot 11/30/07



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March 13, 2012

TO: East Washington Branch Library

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

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

Applicant Name: CMW, Inc.
Permit Number: 097-30555-00297

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

IDEM Staff	GHOTOPP 3/13/2012 CMW Inc. 097-30555-00297 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Cecil Taylor CMW Inc. PO Box 2266 Indianapolis IN 46206 (Source CAATS) via confirmed delivery										
2		Eric Krepps COO CMW Inc. PO Box 2266 Indianapolis IN 46206 (RO CAATS)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)										
7		East Washington Branch Library 2822 East Washington Street Indianapolis IN 46201 (Library)										
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