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: May 9, 2012

RE: Gal Fab, Inc / 131-31279-00018

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Gal Fab, Inc.
612 W. 11th Street
Winamac, Indiana 46996

(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.: M131-31279-00018	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 9, 2012 Expiration Date: May 9, 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 metal waste container manufacturing plant.

Source Address:	612 W. 11th Street, Winamac, Indiana 46996
General Source Phone Number:	574-946-7767
SIC Code:	3444 (Sheet Metal Work)
County Location:	Pulaski
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

(a) Painting operations (identified as EU-01) located at North, Middle and South Paint Rooms, constructed in 1992 and modified in 1999, with a combined total maximum throughput rate of 0.45 metal waste containers per hour using all three rooms, consisting of the following:

(1) Three (3) airless spray guns, with a total maximum primer usage of 2.0 gallons per metal waste container and maximum paint usage of 4.0 gallons per metal waste container, using dry filters for overspray control, and exhausting at stacks S1 and S2.

(2) One (1) clean-up process for the paint guns and tools, with a maximum clean-up usage of 0.8 gallons per metal waste container.

(3) One (1) caustic metal wash process to remove rust and oil from the containers prior to painting, with a maximum caustic detergent usage of 1.40 gallons per metal waste container, with no VOC emissions.

(4) One (1) metal preparation process to remove oil from the metal prior to painting, with a maximum solvent usage equal to 0.32 gallons per metal waste container.

(b) One (1) touch-up spray painting process using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour. The touch-up spray painting is performed at the North, Middle and South Paint Rooms, listed under painting operation (EU-01) and adjoining drying areas.

(c) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.

(d) One (1) steel machining process, including shearing, pressing and punching of cold steel, constructed in 1992, with a maximum throughput rate of 4,000 pounds of steel per hour, and exhausting into the building. The machining utilizes an aqueous coolant to continuously flood the machining interface.

(e) Welding and cutting operations, constructed in 1992, exhausting inside the building and consisting of the following:

(1) Forty-six (46) MIG welding stations, each with a maximum wire consumption rate of 1.50 pounds per hour.

(2) Two (2) stick welding stations, each with a maximum electrode consumption rate of 1.80 pounds per hour.

(3) One (1) TIG welding station, with a maximum wire consumption rate of 2.0 pounds per hour.

(4) Fifteen (15) oxyacetylene cutters, each with a maximum cutting rate of 20 inches per minute and the maximum thickness of the metal is 0.25 inches.

(5) One (1) oxypropylene cutter, with a maximum cutting rate of 40 inches per minute and the maximum thickness of the metal is 2.0 inches.

(f) Natural gas-fired space heaters and make-up air heaters, with a combined maximum total heat input of 5.40 MMBtu per hour.

(g) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(h) Paved and unpaved roads and parking lots with public access.

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, M131-31279-00018, 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 M131-31279-00018 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 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]

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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

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 responsestep 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) Painting operations (identified as EU-01) located at North, Middle and South Paint Rooms, constructed in 1992 and modified in 1999, with a combined total maximum throughput rate of 0.45 metal waste containers per hour using all three rooms, consisting of the following:

(1) Three (3) airless spray guns, with a total maximum primer usage of 2.0 gallons per metal waste container and maximum paint usage of 4.0 gallons per metal waste container, using dry filters for overspray control, and exhausting at stacks S1 and S2.

(2) One (1) clean-up process for the paint guns and tools, with a maximum clean-up usage of 0.8 gallons per metal waste container.

(3) One (1) caustic metal wash process to remove rust and oil from the containers prior to painting, with a maximum caustic detergent usage of 1.40 gallons per metal waste container, with no VOC emissions.

(4) One (1) metal preparation process to remove oil from the metal prior to painting, with a maximum solvent usage equal to 0.32 gallons per metal waste container.

(b) One (1) touch-up spray painting process using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour. The touch-up spray painting is performed at the North, Middle, and South Paint Rooms, listed under painting operation (EU-01) and adjoining drying areas.

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

(a) Pursuant to 326 IAC 8-2-9, for painting operations (identified as EU-01), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating excluding water, as delivered to the applicator for extreme performance coatings.

(b) The touch-up spray painting process (identified as 1A-1) shall be limited to less than fifteen (15) pounds per day of VOC each, including coatings, dilution solvents, and cleaning solvents, when coating metal substrates. This usage limit shall render the requirements 326 IAC 8-2-9 not applicable.

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

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

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning

materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

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

D.1.3 Particulate [326 IAC 6-3-2(d)]

(a) Particulate from the painting operations (identified as EU-01) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

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

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(2) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(b) To document the compliance status with Condition D.1.1(b) the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC daily usage limits established in Condition D.1.1(b).

(1) The VOC usage of each coating material and solvent used for each day when coating metal substrates.

(2) A log of the dates of use.

(3) The amount and content of coating material and solvent less water used when coating metal substrates for each day.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(4) The metal substrate coating cleanup solvent usage for each day.

(5) The total weight of VOC emitted for each day from coating metal substrates.

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

D.1.7 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1(b) shall be submitted not 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 2-6.1-5 by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

(c) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.

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

Emission Limitations and Standards

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 (100) 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.

(5) Equip the degreaser with one (1) of the following control devices 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 (33°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(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.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

(d) One (1) steel machining shaping process, including shearing, pressing and punching of cold steel, constructed in 1992, with a maximum throughput rate of 4,000 pounds of steel per hour, and exhausting into the building. The machining utilizes an aqueous coolant to continuously flood the machining interface.

(e) Welding and cutting operations, constructed in 1992, exhausting inside the building and consisting of the following:

(1) Forty-six (46) MIG welding stations, each with a maximum wire consumption rate of 1.50 pounds per hour.

(2) Two (2) stick welding stations, each with a maximum electrode consumption rate of 1.80 pounds per hour.

(3) One (1) TIG welding station, with a maximum wire consumption rate of 2.0 pounds per hour.

(4) Fifteen (15) oxyacetylene cutters, each with a maximum cutting rate of 20 inches per minute and the maximum thickness of the metal is 0.25 inches.

(5) One (1) oxypropylene cutter, with a maximum cutting rate of 40 inches per minute and the maximum thickness of the metal is 2.0 inches.

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

Emission Limitations and Standards

D.3.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the steel shaping process shall not exceed 6.25 pounds per hour, when operating at a process weight rate of 4,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the welding and cutting operations shall not exceed 6.53 pounds per hour, when operating at a process weight rate of 4,005.30 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

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:	Gal Fab, Inc.
Address:	612 W. 11th Street
City:	Winamac, Indiana 46996
Phone #:	574-946-7767
MSOP #:	M131-31279-00018

I hereby certify that Gal Fab, Inc. is:
☐ still in operation.
☐ no longer in operation.

I hereby certify that Gal Fab, Inc. is:
☐ in compliance with the requirements of MSOP M131-31279-00018.
☐ not in compliance with the requirements of MSOP M131-31279-00018.

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
Compliance and Enforcement Branch,
FESOP Quarterly Report

Source Name: **Gal Fab, Inc.**
Source Address: **612 W. 11th Street, Winamac, Indiana 46996**
MSOP Permit No.: **M 131-31279-00018**
Facility: **Touch-up spray paint operation (1A-1)**
Parameter: **VOC**
Limit: **less than fifteen (15) lbs per day of VOC each, including coatings, dilution solvents and cleaning solvents, when coating metal substrates.**

Month: _____ **Year:** _____

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on_____

Submitted by: _____
Title / Position: _____
Signature:_____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a MSOP Renewal

Source Background and Description

Source Name:	**Gal Fab, Inc.**
Source Location:	**612 W. 11th Street, Winamac, Indiana 46996**
County:	**Pulaski**
SIC Code:	**34444 (Sheet Metal Work)**
Operation Permit No.:	**M131-31279-00018**
Permit Reviewer:	**Janet Mobley**

On March 28, 2012, the Office of Air Quality (OAQ) had a notice published in the Pulaski County Journal, in Winamac, Indiana, stating that Gal Fab, Inc. had applied for a MSOP Renewal to continue operating a waste container manufacturing plant**.** The notice also stated that the OAQ proposed to issue a MSOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On March 23, 2012, Mr. John Kilmer, Consultant with Bruce Carter Associates, LLC submitted comments to IDEM, OAQ on the draft MSOP Renewal.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

> A FESOP quarterly reporting form (page 27 of 27 of the permit) is attached to the permit for daily usage of spray paint (15 lb/day VOC limit) reporting, however, the applicable section (D.1) does not include a reporting requirement. There should be no reporting requirement for touch-up with aerosol paint cans. The facility is required to calculate and document daily VOC usage from aerosol paint touch-up application. To avoid confusion, page 27 of 27 should be deleted, since the facility is required to report quarterly.

Response to Comment 1:

> IDEM agrees that a reporting requirement should be included and the permit as been revised to include the condition in the Record Keeping and Reporting Requirements Section of the permit. The reporting form is not being deleted because it is necessary to show daily compliance even though quarterly reporting is required. The Table of Contents was also revised to include the condition but is not replicated below.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

(a) **. . .**

D.1.7 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1(b) shall be submitted not 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 2-6.1-5 by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Comment 2:

The description of the aerosol can touch-up paint operation (A.2(b), D.1, TSD page 1) should be revised and suggested the following language:

> One (1) touch-up spray painting process using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour, ~~using dry filters for overspray control~~. The touch-up spray painting is performed at the North, Middle and South Paint Rooms, listed under painting operation (EU-01) **and adjoining drying areas.**

Response to Comment 2:

IDEM agrees with the recommended changes to the description and the permit has been revised in Section A.2(b), and D.1. The TSD has not been revised as IDEM, OAQ does not make any changes to the original TSD. The Permit will have the updated changes.

> One (1) touch-up spray painting process using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour. The touch-up spray painting is performed at the North, Middle and South Paint Rooms, listed under painting operation (EU-01) **and adjoining drying areas.**

IDEM Contact

(a) Questions regarding this proposed MSOP Renewal can be directed to Janet Mobley 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) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.

(b) A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	**Gal Fab, Inc.**
Source Location:	**612 W. 11th Street, Winamac, Indiana 46996**
County:	**Pulaski**
SIC Code:	**3444 (Sheet Metal Work)**
Permit Renewal No.:	**M131-31279-00018**
Permit Reviewer:	**Janet Mobley**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Gal Fab, Inc. relating to the operation of a waste container manufacturing plant**.** On December 19, 2011, Gal Fab, Inc. submitted an application to the OAQ requesting to renew its operating permit. Gal Fab, Inc. was issued a MSOP (M131-23462-00018) on April 20, 2007.

Some of the containers being built at the source include:

Bins, hoppers, roll-off boxes, dumpsters, compactors and other sheet metal containers to be used to hold waste determined by the customer.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) Painting operations (identified as EU-01) located at North, Middle and South Paint Rooms, constructed in 1992 and modified in 1999, with a combined total maximum throughput rate of 0.45 metal waste containers per hour using all three rooms, consisting of the following:

(1) Three (3) airless spray guns, with a total maximum primer usage of 2.0 gallons per metal waste container and maximum paint usage of 4.0 gallons per metal waste container, using dry filters for overspray control, and exhausting at stacks S1 and S2.

(2) One (1) clean-up process for the paint guns and tools, with a maximum clean-up usage of 0.8 gallons per metal waste container.

(3) One (1) caustic metal wash process to remove rust and oil from the containers prior to painting, with a maximum caustic detergent usage of 1.40 gallons per metal waste container, with no VOC emissions.

(4) One (1) metal preparation process to remove oil from the metal prior to painting, with a maximum solvent usage equal to 0.32 gallons per metal waste container.

(b) One (1) touch-up spray painting process using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour, using dry filters for overspray control. The touch-up spray painting is performed at the North, Middle and South Paint Rooms, listed under painting operation (EU-01).

(c) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.

(d) One (1) steel machining process, including shearing, pressing and punching of cold steel, constructed in 1992, with a maximum throughput rate of 4,000 pounds of steel per hour, and exhausting into the building. The machining utilizes an aqueous coolant to continuously flood the machining interface.

(e) Welding and cutting operations, constructed in 1992, exhausting inside the building and consisting of the following:

(1) Forty-six (46) MIG welding stations, each with a maximum wire consumption rate of 1.50 pounds per hour.

(2) Two (2) stick welding stations, each with a maximum electrode consumption rate of 1.80 pounds per hour.

(3) One (1) TIG welding station, with a maximum wire consumption rate of 2.0 pounds per hour.

(4) Fifteen (15) oxyacetylene cutters, each with a maximum cutting rate of 20 inches per minute and the maximum thickness of the metal is 0.25 inches.

(5) One (1) oxypropylene cutter, with a maximum cutting rate of 40 inches per minute and the maximum thickness of the metal is 2.0 inches.

(f) Natural gas-fired space heaters and make-up air heaters, with a combined maximum total heat input of 5.40 MMBtu per hour.

(g) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(h) Paved and unpaved roads and parking lots with public access.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no emission units that were constructed and/or are operating without a permit during this review.

Emission Units and Pollution Control Equipment Removed From the Source

The source has not removed emission units during this review.

Existing Approvals

Since the issuance of the MSOP (131-23462-00018) on April 20, 2007, the source has not constructed or has been operating under any additional approvals.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Pulaski County.

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

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

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Pulaski County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Pulaski County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ 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 $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct $PM_{2.5}$ and SO_2 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
Pulaski County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants, excluding GHGs, is less than 100 tons per year. However, VOC, PM, PM10 and PM2.5 is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP 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 Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs CO_2e	Total HAPs	Worst Single HAP
Primers (EU-01)	5.82	5.82	5.82	0.00	0.00	4.42	0.00	0.00	2.08	2.08 Triethylamine
Paints (EU-01)	8.80	8.80	8.80	0.00	0.00	12.45	0.00	0.00	1.03	1.03 Glycol Ethers
Clean-up (EU-01)	0.13	0.13	0.13	0.00	0.00	4.68	0.00	0.00	1.16	0.82 Toluene
Metal Prep (EU-01)	0.00	0.00	0.00	0.00	0.00	3.93	0.00	0.00	0.00	
Touch-up Spray Paints (IA-01)	0.13	0.13	0.13	0.00	0.00	3.00	0.00	0.00	0.99	0.99 Toluene
Natural Gas Combustion - Space Heaters	0.04	0.18	0.18	0.01	2.37	0.13	1.99	2,855.51	0.04	0.04 Hexane
Welding/Cutting (IA-03)	8.65	8.65	8.65	0.00	0.00	0.00	0.00	0.00	0.21	0.19 Manganese
Total PTE of Entire Source	**23.56**	**23.69**	**23.69**	**0.01**	**2.37**	**28.60**	**1.99**	**2,855.51**	**5.51**	2.08 Triethylamine
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

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".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.

MSOP Status

(a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

(a) 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.

New Source Performance Standards (NSPS)

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.

(b) The New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not included in the permit for this source because the surface coating operation performed at the source is applied to steel waste containers, and not metal furniture.

(c) The New Source Performance Standards for Metal Coil Surface Coating (40 CFR Part 60.460 - 60.466, Subpart TT) are not included in the permit for this source because it is not a major source for HAP emissions.

(d) New Source Performance Standards of Performance for Industrial Surface Coating: Large Appliances (40 CFR Part 60.450, Subpart SS) are not included in the permit for this source because the source does not have any large appliance surface coating line and hence the requirements of 40 CFR 60.450, Subpart SS are not included in the permit.

Pursuant to 40 CFR 60.451, large appliance surface coating line means that portion of large appliance assembly plant engaged in the application and curing of organic surface coatings on large appliance parts or products. Large appliance part means any organic surface-coated metal lid, door, casing, panel, or other interior or exterior metal part or accessory that is assembled to form any large appliance product like organic surface-coated metal range, oven, microwave oven, refrigerator, freezer, washer, dryer, dishwasher, water heater, or trash compactor manufactured for household, commercial, or recreational use. The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.450), Subpart SS, Standards of Performance for Industrial Surface Coating: Large Appliances apply to each surface coating operation in a large appliance surface coating line that commenced construction, modification, or reconstruction after December 24, 1980.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61, and 40 CFR 63) included in the permit for this source.

(b) The National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products (40CFR 63, Subpart MMMM) are not included in the permit for this source because it is not a major source for HAP emissions.

(c) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) are not included in the permit for this source because the materials used in the degreasing operations do not contain any halogenated HAP as specified in 40 CFR 63.460.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH (326 IAC 20-80), are not included in the permit because the source does not use paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), does not perform autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations as defined in 63.11180, and does not perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit because the source's SIC code (3714) is not included in the EPA source category list for the nine metal fabrication and finishing source categories. Although the source engages in making metal containers, it does not qualify as one of the nine source categories, rendering this rule not applicable.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3 whenever a control device is required for compliance with any applicable emission limitations and/or air pollution control regulations. The use of a control device to limit the particulate emissions of PM, PM10 and PM2.5 to less than PSD and TV thresholds is required. Therefore a PMP is still required for these units and their associated control devices.

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the unrestricted potential emissions section above.

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

This source was constructed in 1992 and modified in 1999. The source is not in 1 of the 28 source categories and has the potential to emit of each criteria pollutant after pollution controls that is less than two hundred and fifty (250) tons per year. Therefore, the provisions of 326 IAC 2-2 do not apply.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The source was constructed in 1992 and modified in 1999. The Permittee was issued a FESOP.

On November 29, 2004, ethylene glycol monobutyl ether (EGBE, 2-Butoxyethanol), CAS Number 111–76–2 was deleted from the list of hazardous air pollutants established by 42 U.S.C. 7412(b)(1). Most of the paints used at the source contained EGBE, 2-Butoxyethanol. After the ethylene glycol was deleted from the list of HAPs, the permit level was changed to a MSOP. Therefore, the revised potential to emit HAPsfrom the entire source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for combination of HAPs. Therefore, the provisions of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

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 the 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.

326 IAC 6-4 (Fugitive Dust Emissions)

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5 because the potential fugitive particulate matter emissions are from roads and parking lots and are less than twenty-five (25) tons per year.

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitations for Lake County

This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

326 IAC 8-2-7 (Large appliance coating operations)

Pursuant to 326 IAC 8-2-7, the requirements are not applicable because the source does not operate a large appliance surface coating line for residential or commercial products (trash compactor is industrial).

State Rule Applicability – Individual Facilities

State Rule Applicability - Painting Operations, Touch-up Spray Painting Process

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

(a) The painting operations (identified as EU-01) are subject to the provisions of 326 IAC 6-3 because these painting operations use more than five (5) gallons of coating per day.

(1) Particulate from the surface coating operations shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(3) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(b) The touch-up spray painting process (identified as 1A-1) is exempt from the requirements of 326 IAC 6-3-2 because this spray coating operation uses less than five (5) gallons of coatings per day.

326 IAC 8-2-7 (Large appliance coating operations)

Pursuant to 326 IAC 8-2-7, the requirements are not applicable to the painting operations (identified as EU-01) because the source does not operate a large appliance surface coating line for residential or commercial products (trash compactor is industrial).

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

(a) The painting operations (EU-01) are used to paint steel waste containers and the source operates under the paint Standard Industrial Classification Code major group #34. In addition, the painting operations were constructed after July 1, 1990 and have actual VOC emissions greater than 15 pounds per day. Therefore, the painting operations are subject to 326 IAC 8-2-9 and must comply with the provisions of 326 IAC 8-2-9 as follows:

(1) The VOC content of the coatings applied in the paint booths shall not exceed three and five tenths (3.5) pounds VOC per gallon of coating, excluding water, delivered to the applicators for application of extreme performance coatings.

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

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

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

Based on the MSDS submitted by the Permittee and the calculations made, the VOC content of the coating delivered to painting operations (identified as EU-01) are in compliance with this rule.

All paints are applied "as purchased" in the painting operation and no thinners are added before paint application.

(b) The touchup is not a separate booth, (no booth is associated with this operation but is used in conjunction with the painting operations (EU-01) and takes place in the drying area or paint booths and VOC exhaust to stacks V1 and V2. Worst case is all units receive max touchup (average is much less) and worst case is both primer & paint touchup.

The touch-up spray painting process (identified as 1A-1) shall be limited to less than fifteen (15) pounds per day of VOC each, including coatings, dilution solvents, and cleaning solvents, when coating metal substrates. This usage limit shall render the requirements 326 IAC 8-2-9 not applicable.

To show compliance with the limit of 15 pounds per day in the touch-up spray painting process the source shall:

Maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC daily usage limits established in Condition D.1.1(b).

(1) The VOC usage of each coating material and solvent used for each day when coating metal substrates.

(2) A log of the dates of use.

(3) The amount and content of coating material and solvent less water used when coating metal substrates for each day.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(4) The metal substrate coating cleanup solvent usage for each day.

(5) The total weight of VOC emitted for each day from coating metal substrates.

This is a new limit in this renewal.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

(a) The provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) applies to painting operations (identified as EU-01). Therefore, the provisions of 326 IAC 8-1-6 do not apply.

(b) The requirements of 326 IAC 8-1-6 are not applicable to the touch-up spray painting booth, constructed or modified after January 1, 1980, the applicability date for this rule because this process does not result in the potential VOC emissions equal to greater than twenty-five (25) tons of VOCs per year and this facility would be subject to 326 IAC 8-2-9 if the actual VOC usage ever exceeds 15 pounds per day.

State Rule Applicability - Natural-Gas Fired Combustion Units

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because according to 326 IAC 6-3-1(b)(14) manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from the provisions of this rule.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because these units are not indirect heating units.

State Rule Applicability – Welding and Cutting Processes

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The welding process at the source consumes more than 625 pounds of rod or wire per day and the potential emissions are greater than 0.551 pounds per day. The Torch cutting operations are not exempt because it is cutting more than one (1) inch thickness of stock.

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from the welding and cutting operations shall not exceed 6.53 pounds per hour when the process weight rate is 4,005.30 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

State Rule Applicability – Petroleum Liquid Dispensing Facility

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The Permittee is not subject to the provisions of 326 IAC 8-4-3 because the storage vessel at this source has a storage capacity less than thirty-nine thousand (39,000) gallons.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995, stationary vessels used to store volatile organic liquids (VOL) must comply with the requirement of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. Since this source is located in Pulaski County this rule does not apply.

State Rule Applicability – Degreasing

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The degreaser facility was installed after July 1, 1990, performs organic solvent degreasing operations and does not have a remote reservoir. Therefore, the provisions of 326 IAC 8-3-2 and 326 IAC 8-3-5(a) and (b) are applicable to the degreasing operations at the source.

State Rule Applicability – Steel Shaping Process

326 IAC 6-3-2 (Particulate Matter Emissions for Manufacturing Processes)

The steel shaping process includes steel shearing, pressing and punching operations. Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from the steel shaping process shall not exceed 6.52 pounds per hour when the process weight rate is 4,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

Steel shaping includes presses, punches and shears which are listed in the permit as Item (g). There are no emissions from the presses, punches or shears as these involve physical manipulation of cold steel. The shaping operations also include lathes, mills and saws which include machining of steel where an aqueous cutting coolant continuously floods the machining interface. The machining operations are included in the permitted activities. Emissions from an aqueous cutting coolant which continuously floods the machining interface is a listed exempt activity (326 IAC 2-1.1-3(e)(10)(B). Therefore, emissions from these operations are considered negligible.

Compliance Determination, Monitoring and Testing Requirements

The compliance monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Painting Operation (EU-01), with stacks (S1 and S2) and Touchup Spray Painting Process (1A-1) - Dry Filters as control	Integrity and particulate loading inspections	Daily	NA	Response Steps
	Overspray observations	Weekly	Presence of overspray	
	Stack inspections	Monthly	Noticeable change or presence of overspray on rooftop or on ground nearby	

These monitoring conditions are necessary because the dry filters for the painting operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions for Manufacturing Processes) and 326 IAC 2-6.1 (MSOP).

Testing Requirements

There are no testing requirements applicable to this source.

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

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 December 19, 2011. Additional information was received on January 31 and February 8, 2012 .

Conclusion

The operation of this waste container manufacturing plant shall be subject to the conditions of the attached MSOP Renewal No. 131-31279-00018.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Janet Mobley 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) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emission Calculations
SUMMARY

Company Name: Gal Fab, Inc.
Address City IN Zip: 612 West 11th St., Winamac, IN 46996
Permit Number: 131-31279-00018
Reviewer: Janet Mobley

Uncontrolled POTENTIAL TO EMIT IN TONS PER YEAR											
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Total HAPs	Single HAPs	Worst Case Single Hap
Primers (EU-01)	5.82	5.82	5.82	0.00	0.00	4.42	0.00	0.00	2.08	2.08	Triethylamine
Paints (EU-01)	8.80	8.80	8.80	0.00	0.00	12.45	0.00	0.00	1.03	1.03	Glycol Ethers
Clean-up (EU-01)	0.00	0.00	0.00	0.00	0.00	0.13	0.00	0.00	1.16	0.82	Toluene
Metal Prep (EU-01)	0.00	0.00	0.00	0.00	0.00	3.93	0.00	0.00	0.00	0.00	
Touch-up Spray Paints (IA-01)	0.13	0.13	0.13	0.00	0.00	3.00	0.00	0.00	0.99	0.99	Toluene
Natural Gas Combustion - Space Heaters	0.04	0.18	0.18	0.01	2.37	0.13	1.99	2,855.51	0.04	0.04	Hexane
Welding/Cutting (IA-03)	8.65	8.65	8.65	0.00	0.00	0.00	0.00	0.00	0.21	0.19	Manganese
TOTAL	**23.43**	**23.57**	**23.57**	**0.01**	**2.37**	**24.05**	**1.99**	**2,855.51**	**5.51**	**2.08**	Triethylamine

PM10=PM=PM2.5

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

Company Name: Gal Fab, Inc.
Address City IN Zip: 612 West 11th St., Winamac, IN 46996
Permit Number: 131-31279-00018
Reviewer: Janet Mobley

EU-01 Primer Usage

Material	ID#	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Primers															
Gray Epoxy Ester	MP-90	10.84	45.56%	36.42%	0.09	47.34%	2.0	0.450	1.88	0.99	0.89	21.40	3.91	5.82	75%
Red Oxide Epoxy Ester	MP-26D	10.55	48.21%	38.35%	0.10	48.51%	2.0	0.450	2.02	1.04	0.94	22.47	4.10	5.38	75%
Gray Primer	MP-105D	10.46	55.96%	45.25%	0.11	56.76%	2.0	0.450	2.59	1.12	1.01	24.20	4.42	4.54	75%
Add worst case coating to all solvents													**4.42**	**5.82**	

Note: Potential VOC tons/year is the combined total of using all three rooms in a series based on the highest paint capacity product, not each.

METHODOLOGY

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

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

Company Name: Gal Fab, Inc.
Address City IN Zip: 612 West 11th St., Winamac, IN 46996
Permit Number: 131-31279-00018
Reviewer: Janet Mobley

EU-01 Paint Usage

Material	ID#	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
PAINTS															
White	MP-1	10.21	56.29%	42.04%	14.25%	51.46%	4.0	0.450	3.00	1.45	2.62	62.85	11.47	8.80	75.00%
White	MP-1D	9.67	62.49%	51.42%	11.07%	59.62%	4.0	0.450	2.65	1.07	1.93	46.24	8.44	7.15	75.00%
Black	MP-2D	8.41	74.32%	57.55%	16.77%	58.04%	4.0	0.450	3.36	1.41	2.54	60.93	11.12	4.26	75.00%
Red	MP-5D	8.52	68.99%	50.45%	18.54%	51.53%	4.0	0.450	3.26	1.58	2.84	68.24	12.45	5.21	75.00%
Medium Blue	MP-6	8.62	69.40%	54.11%	15.29%	55.93%	4.0	0.450	2.99	1.32	2.37	56.94	10.39	5.20	75.00%
Medium Blue	MP-60	8.70	71.31%	55.80%	15.51%	58.20%	4.0	0.450	3.23	1.35	2.43	58.29	10.64	4.92	75.00%
Dark Green	MP-11	8.67	68.87%	53.58%	15.29%	55.70%	4.0	0.450	2.99	1.33	2.39	57.27	10.45	5.32	75.00%
Medium Green	MP-12	8.53	68.20%	51.63%	16.57%	52.81%	4.0	0.450	3.00	1.41	2.54	61.06	11.14	5.35	75.00%
Chrome Yellow	MP-16D	8.68	69.57%	54.36%	15.21%	56.58%	4.0	0.450	3.04	1.32	2.38	57.03	10.41	5.21	75.00%
Cocoa Brown	MP-18	8.77	68.20%	53.17%	15.03%	55.91%	4.0	0.450	2.99	1.32	2.37	56.94	10.39	5.50	75.00%
Beige	MP-19	9.83	60.02%	46.09%	13.93%	54.33%	4.0	0.450	3.00	1.37	2.46	59.15	10.80	7.75	75.00%
Diamond Brown	MP-20D	8.80	70.65%	54.85%	15.80%	57.88%	4.0	0.450	3.30	1.39	2.50	60.07	10.96	5.09	75.00%
Packer Green	MP-33	8.80	66.66%	51.62%	15.04%	54.47%	4.0	0.450	2.91	1.32	2.38	57.18	10.43	5.78	75.00%
UPS Brown	MP-41D	8.75	71.09%	55.77%	15.32%	58.51%	4.0	0.450	3.23	1.34	2.41	57.91	10.57	4.99	75.00%
USA Waste Green	MP-56	8.67	70.46%	56.00%	14.46%	58.22%	4.0	0.450	3.00	1.25	2.26	54.16	9.88	5.05	75.00%
Onyx Green	MP-70SW	8.51	67.38%	52.22%	15.16%	53.26%	4.0	0.450	2.76	1.29	2.32	55.73	10.17	5.47	75.00%
Allied Waste Blue	MP-90D	8.61	74.46%	62.27%	12.19%	64.29%	4.0	0.450	2.94	1.05	1.89	45.34	8.27	4.33	75.00%
Premier Orange	MP-98D	8.67	70.32%	55.33%	14.99%	57.52%	4.0	0.450	3.06	1.30	2.34	56.14	10.25	5.07	75.00%

Note: Potential VOC tons/year is the combined total of using all three rooms in a series based on the highest paint capacity product, not each.

METHODOLOGY

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

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

Company Name: Gal Fab, Inc.
Address City IN Zip: 612 West 11th St., Winamac, IN 46996
Permit Number: 131-31279-00018
Reviewer: Janet Mobley

Clean-up Process for Paint Guns & Tools

Material	ID#	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Laquer Thinner	MP-23D	6.95	100.00%	18.97%	81.03%	0.0%	0.10	0.450	5.63	5.63	0.25	6.08	1.11	0.00	75%
Mineral Spirits	MP-24	6.55	100.00%	0.00%	100.00%	0.0%	0.10	0.450	6.55	6.55	0.29	7.07	1.29	0.00	75%
Paint Gun Cleaner	MP-27	8.51	95.00%	72.40%	22.60%	0.0%	0.60	0.450	1.92	1.92	0.52	12.46	2.27	0.13	75%
													4.68	**0.13**	

METHODOLOGY

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

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

Company Name: Gal Fab, Inc.
Address City IN Zip: 612 West 11th St., Winamac, IN 46996
Permit Number: 131-31279-00018
Reviewer: Janet Mobley

Metal Preparation Process

Material	ID#	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Butyl Cellosolve	MP-102	7.51	100.00%	0.0%	100.0%	0.0%	0.02000	0.450	7.51	7.51	0.07	1.62	0.30	0.00	75%
VMP NAPTHA	MP-8	6.15	100.00%	0.0%	100.0%	0.0%	0.30000	0.450	6.15	6.15	0.83	19.93	3.64	0.00	75%
													3.93	**0.00**	

METHODOLOGY

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

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

Company Name: **Gal Fab, Inc.**
Address City IN Zip: **612 West 11th St., Winamac, IN 46996**
Permit Number: **131-31279-00018**
Reviewer: **Janet Mobley**

TOUCH UP BOOTH (1A-1)

Material	ID#	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Spray Black	MP-28	7.97	80.00%	0.0%	80.0%	0.0%	0.10000	0.450	6.38	6.38	0.29	6.89	1.26	0.08	75%
Spray Gray Primer	MP-47	9.80	90.00%	0.0%	90.0%	0.0%	0.10000	0.450	8.82	8.82	0.40	9.53	1.74	0.05	75%

Potential Emissions	**16.41**	**3.00**	**0.13**

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Gal Fab, Inc.
Address City IN Zip: 612 West 11th St., Winamac, IN 46996
Permit Number: 131-31279-00018
Permit Reviewer: Janet Mobley

EU-01 and 1A-1 HAPs

Material	ID#	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Cobalt Compounds	Weight % Xylene&Ebenz	Weight % Toluene	Weight % Triethylamine	Weight % Glycol Ethers	Weight % Methanol	Cobalt Compounds (ton/yr)	Xylene & Ebenz Emissions (ton/yr)	Toluene Emissions (ton/yr)	Triethylamine Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	TOTAL HAPs PTE (ton/yr)
Primers																	
Gray Epoxy Ester	MP-90	10.84	2.00	0.450				1.20%						0.51			0.51
Red Oxide Epoxy Ester	MP-26D	10.55	2.00	0.450				5.00%						2.08			2.08
Gray Primer	MP-105D	10.46	2.00	0.450													0.00
Paints																	
White	MP-1	10.21	4.00	0.450													0.00
White	MP-1D	9.67	4.00	0.450	0.001						0.09						0.00
Black	MP-2D	8.41	4.00	0.450	0.002				1.20%		0.11				0.80		0.80
Red	MP-5D	8.52	4.00	0.450											0.00		0.00
Medium Blue	MP-6	8.62	4.00	0.450											0.00		0.00
Medium Blue	MP-6D	8.70	4.00	0.450	0.002				1.20%		0.11				0.82		0.82
Dark Green	MP-11	8.67	4.00	0.450													0.00
Medium Green	MP-12	8.53	4.00	0.450													0.00
Chrome Yellow	MP-16D	8.68	4.00	0.450	0.002						0.11						0.00
Cocoa Brown	MP-18	8.77	4.00	0.450													0.00
Beige	MP-19	9.83	4.00	0.450													0.00
Diamond Brown	MP-20D	8.80	4.00	0.450	0.002				1.10%		0.12				0.76		0.76
Packer Green	MP-33	8.80	4.00	0.450													0.00
UPS Brown	MP-41D	8.75	4.00	0.450	0.002				1.50%		0.10				1.03		1.03
USA Waste Green	MP-56	8.67	4.00	0.450													0.00
Onyx Green	MP-70SW	8.51	4.00	0.450													0.00
Allied Waste Blue	MP-90D	8.61	4.00	0.450	0.001						0.08						0.00
Premier Orange	MP-98D	8.67	4.00	0.450	0.002				1.50%		0.10				1.03		1.03
Clean-up																	
Laquer Thinner	MP-23D	6.95	0.10	0.450			60.00%			25.00%			0.82			0.34	1.16
Mineral Spirits	MP-24	6.55	0.10	0.450													0.00
Paint Gun Cleaner	MP-27	8.51	0.60	0.450													0.00
Metal Prep																	
Butyl Cellosolve	MP-102	10.04	0.02	0.450									0.00				0.00
VMP Naptha	MP-8	10.04	0.30	0.450									0.00				0.00
Touch-Up Spray Paint																	
Spray Black	MP-28	10.04	0.10	0.450		30.00%	20.00%					0.59	0.40				0.99
Spray Gray Primer	MP-47	10.04	0.10	0.450								0.00	0.00				0.00
										"Worst Case" Individual HAP		**0.59**	**0.40**	**2.08**	**1.03**	**1.16**	
										"Worst Case" Total HAPs		**5.26**					

METHODOLOGY

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

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

Company Name: Gal Fab, Inc.
Address City IN Zip: 612 West 11th St., Winamac, IN 46996
Permit Number: 131-31279-00018
Reviewer: Janet Mobley

Space Heaters and Air-Makeup Units - combined capacity

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
5.40	1000	47.3

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.04	0.18	0.18	0.01	2.37	0.13	1.99

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 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 next page for HAPs emissions calculations.

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

Company Name: **Gal Fab, Inc.**
Address City IN Zip: **612 West 11th St., Winamac, IN 46996**
Permit Number: **131-31279-00018**
Reviewer: **Janet Mobley**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.967E-05	2.838E-05	1.774E-03	4.257E-02	8.042E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.183E-05	2.602E-05	3.311E-05	8.988E-06	4.967E-05
					Total 4.464E-02

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See next page for Greenhouse Gas calculations.

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

Company Name: Gal Fab, Inc.
Address City IN Zip: 612 West 11th St., Winamac, IN 46996
Permit Number: 131-31279-00018
Reviewer: Janet Mobley

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,838	0.1	0.1
Summed Potential Emissions in tons/yr	2,838		
CO2e Total in tons/yr	2,856		

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

Welding and Thermal Cutting Operations

Company Name: Gal Fab, Inc.
Address City IN Zip: 612 West 11th St., Winamac, IN 46996
Permit Number: 131-31279-00018
Reviewer: Janet Mobley

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Submerged Arc	0	0		0.036	0.011			0.000	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(carbon steel)	46	1.50		0.0055	0.0005			0.380	0.035	0.000	0	0.035
Stick (E7018 electrode)	2	1.80		0.0211	0.0009			0.076	0.003	0.000	0	0.003
Tungsten Inert Gas (TIG)(carbon stee	1	2.00		0.0055	0.0005			0.011	0.001	0.000	0	0.001
Oxyacetylene(carbon steel)		0.50		0.0055	0.0005			0.000	0.000	0.000	0	0.000
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	15	0.25	20	0.1622	0.0005	0.0001	0.0003	0.730	0.002	0.000	0.001	0.004
Oxpropylene	1	2	40	0.1622	0.0005	0.0001	0.0003	0.779	0.002	0.000	0.001	0.004
Oxymethane	0	0		0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0		0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								1.97	0.04			0.05
Potential Emissions lbs/day								47.40	1.04			1.13
Potential Emissions tons/year								8.65	0.19			0.21

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculting the emissions.

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

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

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

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs

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: Randy Sommers
Gal Fab, Inc
612 W 11th St
Winamac, IN 46996

DATE: May 9, 2012

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

SUBJECT: Final Decision
MSOP - Renewal
131-31279-00018

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:
John Kilmer (Bruce Carter Associates)
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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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May 9, 2012

TO: Pulaski County Public Library

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

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

Applicant Name: Gal Fab, Inc
Permit Number: 131-31279-00018

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	MIDENNEY 5/9/2012 Gal Fab, Inc. 131-31279-00018 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Randy Sommers Gal Fab, Inc. 612 W 11th St Winamac IN 46996 (Source CAATS) via confirm delivery									
2		Mr. Gary Hanner Hanner Hanner & Hanner Hanner Hanner & Hanner P.O. Box 122 Rockville IN 47872 *(Affected Party)*									
3		Pulaski County Commissioners 112 East Main Street, Rm 200 Winamac IN 46996 *(Local Official)*									
4		Winamac Town Council and Town Manager 120 West Main Street Winamac IN 46996 *(Local Official)*									
5		Pulaski County Health Department 125 S. Riverside Dr, County Bldg, Suite 205 Winamac IN 46996-1528 *(Health Department)*									
6		Pulaski Co Public Library 121 S Riverside Dr Winamac IN 46996-1596 *(Library)*									
7		Mr. John W. Kilmer Bruce Carter Associates 6330 E 75th Street #150 Indianapolis IN 46250 *(Consultant)*									
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