



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
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: April 9, 2013

RE: Sky Cylinder Testing, Inc. / 163-32445-00156

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Sky Cylinder Testing, Inc.
2220 Lexington Road
Evansville, Indiana 47720

(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.: M163-32445-00156	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 9, 2013 Expiration Date: April 9, 2023

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability	
B.5 Severability	
B.6 Property Rights or Exclusive Privilege	
B.7 Duty to Provide Information	
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.9 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.12 Permit Renewal [326 IAC 2-6.1-7]	
B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.14 Source Modification Requirement	
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]	
B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.17 Annual Fee Payment [326 IAC 2-1.1-7]	
B.18 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	11
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1 Permit Revocation [326 IAC 2-1.1-9]	
C.2 Opacity [326 IAC 5-1]	
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5 Fugitive Dust Emissions [326 IAC 6-4]	
C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.12 Response to Excursions or Exceedances	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	
Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]	

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS 17

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

- D.1.1 Particulate Matter (PM) Limitations [326 IAC 6.5-1-2]
- D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 8-2-9]
- D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.1.4 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]
- D.1.5 Particulate Control

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

- D.1.6 Record Keeping Requirements

D.2 EMISSIONS UNIT OPERATION CONDITIONS.....19

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

- D.2.1 Particulate Matter (PM) Limitations [326 IAC 6.5-1-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.2.3 Particulate Control

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

- D.2.4 Visible Emissions Notations
- D.2.5 Broken or Failed Dust Collector Detection
- D.2.6 Parametric Monitoring

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

- D.2.7 Record Keeping Requirements

D.3 EMISSIONS UNIT OPERATION CONDITIONS.....22

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

- D.2.1 Particulate Matter (PM) Limitations [326 IAC 6-2-4]

Annual Notification 23

Malfunction Report 244

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 compressed gas cylinder testing and refurbishing facility.

Source Address:	2220 Lexington Road, Evansville, Indiana 47720
General Source Phone Number:	(812) 423-1759
SIC Code:	7699 and 8734
County Location:	Vanderburgh
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) One (1) paint booth with automatic arm, constructed in 2002, using one (1) HVLP spray gun equipped with dry filters, capable of painting 30 industrial gas steel cylinders per hour, and venting outside the building.
- (b) One (1) robotic paint booth, constructed in 2002, using one (1) HVLP spray gun equipped with dry filter, capable of painting 20 industrial gas steel cylinders per hour, and venting outside the building.
- (c) One (1) touch up spray paint booth 3'x3', constructed in 2008, using one (1) HVLP spray gun equipped with dry filter, capable of painting 12.5 small medical cylinders per hour, and venting outside the building.
- (d) One (1) touch up spray paint booth 8'x8', constructed in 2008, using one (1) HVLP spray gun equipped with dry filter, capable of painting either 12.5 small medical cylinders or 1.25 cylinder cart frames per hour, and venting outside the building.
- (e) Three (3) abrasive blaster units, constructed in 2002, and one (1) abrasive blaster unit, constructed in 2010, propelling steel shots, with a maximum capacity of 6,621 pounds of steel shot and steel cylinders per hour, equipped with a dust collector consisting of eight (8) cartridge filters, and venting outside the building.
- (f) Two (2) buffing machines, identified as unit #7 and unit #8, approved for construction in 2013, with a maximum capacity of 300 pounds per hour, equipped with a dust collector as control, and exhausting outside the building.
- (g) Two (2) dip tanks, identified as unit #10a and #10b, approved for construction in 2013, with a collective maximum capacity of 300 cylinders per day, and exhausting to the indoors.

- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include:
 - (1) Four (4) furnaces with a maximum heat input capacity of 0.1 MMBtu/hr.
 - (2) One (1) furnace with a maximum heat input capacity of 0.075 MMBtu/hr.
 - (3) One (1) furnace with a maximum heat input capacity of 0.4 MMBtu/hr.
 - (4) One (1) furnace with a maximum heat input capacity of 0.03 MMBtu/hr.
 - (5) One (1) furnace with a maximum heat input capacity of 0.126 MMBtu/hr.
 - (6) One (1) water heater with a maximum heat input capacity of 0.199 MMBtu/hr.
 - (7) One (1) water heater with a maximum heat input capacity of 0.074 MMBtu/hr.

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, M163-32445-00156, 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 M163-32445-00156 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 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.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 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.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.
- (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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 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.11 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.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 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.14 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.15 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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) paint booth with automatic arm, constructed in 2002, using one (1) HVLP spray gun equipped with dry filters, capable of painting 30 industrial gas steel cylinders per hour, and venting outside the building.
- (b) One (1) robotic paint booth, constructed in 2002, using one (1) HVLP spray gun equipped with dry filter, capable of painting 20 industrial gas steel cylinders per hour, and venting outside the building.
- (c) One (1) touch up spray paint booth 3'x3', constructed in 2008, using one (1) HVLP spray gun equipped with dry filter, capable of painting 12.5 small medical cylinders per hour, and venting outside the building.
- (d) One (1) touch up spray paint booth 8'x8', constructed in 2008, using one (1) HVLP spray gun equipped with dry filter, capable of painting 12.5 small medical cylinders or 1.25 cylinder cart frames per hour, and venting outside the building.

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

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

D.1.1 Particulate Matter (PM) Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from each of the paint booths shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), when coating metal parts, the volatile organic compound (VOC) content of the coating delivered to the applicator at the paint booth with automatic arm and the robotic paint booth shall be limited to 3.0 pounds per gallon of coating, excluding water, for coating application systems.
- (b) 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 be 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 of 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 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.1.4 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limitations contained in Condition D.1.2(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 Particulate Control

In order to comply with Condition D.1.1, the dry filters associated with the each of the paint booths shall be in operation and control particulate emissions from each of the paint booths at all times that the paint booths are in operation.

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.2(a). 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.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) Three (3) abrasive blaster units, constructed in 2002, and one (1) abrasive blaster unit, constructed in 2010, propelling steel shots, with a maximum capacity of 6,621 pounds of steel shot and steel cylinders per hour, equipped with a dust collector consisting of eight (8) cartridge filters, and venting outside the building.
- (f) Two (2) buffing machines, identified as unit #7 and unit #8, approved for construction in 2013, with a collective maximum capacity of 300 pounds of cylinders per hour, equipped with a dust collector as control, and exhausting outside the building.

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

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

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

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from each of the abrasive blaster units and buffing machines shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for each of the shot blaster units and buffing machines and their associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this permit condition.

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with Condition D.2.1, the dust collectors for particulate control shall be in operation at all times that the shot blasting units and buffing machines are in operation.
- (b) In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the shot blaster dust collector stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.5 Broken or Failed Dust Collector Detection

- (a) For a single compartment dust collector controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).
- (b) For a single compartment dust collector controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the unit. Operations may continue only if the event qualifies as an emergency and the Registrant satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

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

D.2.6 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the abrasive blasters, at least once per day when the abrasive blasters are in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replace at least once every six (6) months.

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

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the shot blaster dust collector stack exhaust. The Permittee shall include in its daily record when a visible emission notation

is not taken and the reason for the lack of a visible emission notation, (e.g., the process did not operate that day).

- (b) To document the compliance status with Condition D.2.6, the Permittee shall maintain daily records of the pressure drop across the dust collector controlling the shot blaster units. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g., the process did not operate that day).
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include:
 - (6) One (1) water heater with a maximum heat input capacity of 0.199 MMBtu/hr.
 - (7) One (1) water heater with a maximum heat input capacity of 0.074 MMBtu/hr.

(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.3.1 Particulate Matter (PM) Limitations [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from the water heaters shall not exceed 0.60 pounds per million Btu (lbs/MMBtu) heat input.

**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:	Sky Cylinder Testing, Inc.
Address:	2220 Lexington Road
City:	Evansville, Indiana 47720
Phone #:	(812) 423-1759
MSOP #:	M163-32445-00156

I hereby certify that Sky Cylinder Testing, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Sky Cylinder Testing, Inc. is :

in compliance with the requirements of MSOP M163-32445-00156.

not in compliance with the requirements of MSOP M163-32445-00156.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

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

Source Description and Location

Source Name:	Sky Cylinder Testing, Inc.
Source Location:	2220 Lexington Road, Evansville, IN 47720
County:	Vanderburgh County
SIC Code:	7699 (Repair Shops and Related Services, Not Elsewhere Classified) and 8734 (Testing Laboratories)
Operation Permit No.:	M163-32445-00156
Permit Reviewer:	Adam Wheat

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Sky Cylinder Testing, Inc. (Sky Cylinder) relating to the continued operation of a stationary compressed gas cylinder testing and refurbishing facility. On October 24, 2012, Sky Cylinder submitted an application to the OAQ requesting to renew its operating permit and proposed construction and operation of two buffing machines, two dip tanks, and one dust collector at the existing plant. Sky Cylinder was issued its initial MSOP (M163-18902-00156) on March 11, 2008.

Source Definition

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

- (a) One (1) paint booth with automatic arm, constructed in 2002, using one (1) HVLP spray gun equipped with dry filters, capable of painting 30 industrial gas steel cylinders per hour, and venting outside the building.
- (b) One (1) robotic paint booth, constructed in 2002, using one (1) HVLP spray gun equipped with dry filter, capable of painting (20 industrial gas steel cylinders per hour, and venting outside the building.
- (c) One (1) touch up spray paint booth 3'x3', constructed in 2008, using one (1) HVLP spray gun equipped with dry filter, capable of painting 12.5 small medical cylinders per hour, and venting outside the building.
- (d) One (1) touch up spray paint booth 8'x8', constructed in 2008, using one (1) HVLP spray gun equipped with dry filter, capable of painting either 12.5 small medical cylinders or 1.25 cylinder cart frames per hour, and venting outside the building.
- (e) Three (3) abrasive blaster units, constructed in 2002, and one (1) abrasive blaster unit, constructed in 2010, propelling steel shots, with a maximum capacity of 6,621 pounds of steel shot and steel cylinders per hour, equipped with a dust collector consisting of eight (8) cartridge filters, and venting outside the building.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include:
 - (1) Four (4) furnaces with a maximum heat input capacity of 0.1 MMBtu/hr.
 - (2) One (1) furnace with a maximum heat input capacity of 0.075 MMBtu/hr.
 - (3) One (1) furnace with a maximum heat input capacity of 0.4 MMBtu/hr.
 - (4) One (1) furnace with a maximum heat input capacity of 0.03 MMBtu/hr.
 - (5) One (1) furnace with a maximum heat input capacity of 0.126 MMBtu/hr.
 - (6) One (1) water heater with a maximum heat input capacity of 0.199 MMBtu/hr.
 - (7) One (1) water heater with a maximum heat input capacity of 0.074 MMBtu/hr.

Existing Approvals

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

- (a) MSOP No. 163-18902-00156, issued on March 11, 2008.
- (b) MSOP Notice-Only Change No. 163-29799-00156, issued on January 5, 2011.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, for the 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective October 27, 2011, for PM _{2.5}
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Attainment effective October 18, 2000 for the 1-hour ozone standard for the Evansville area including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. the 1-hour designation was revoked effective June 15, 2005.	

- (a) Ozone Standards
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM_{2.5} Standards

Vanderburgh 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 SO₂ 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

Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Sky Cylinder Testing, Inc. on October 24, 2012, relating to two (2) buffing machines and two (2) dip tanks.

The following is a list of the new emission units:

- (a) Two (2) buffing machines, identified as unit #7 and unit #8, approved for construction in 2013, with a collective maximum capacity of 300 pounds of cylinders per hour, controlled by a dust collector, and exhausting outside the building.
- (b) Two (2) dip tanks, identified as unit #10a and #10b, approved for construction in 2013, with a collective maximum capacity of 300 cylinders per day, and exhausting to the indoors.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	96.51
PM2.5	86.49
PM10 ⁽¹⁾	86.49
SO ₂	0.003
NO _x	0.57
VOC	14.04
CO	0.48
GHGs as CO ₂ e	690

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

HAPs	Potential To Emit (tons/year)
TOTAL HAPs	0.01

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM2.5, and PM10 are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Greenhouse gases (GHGs) as CO₂e

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in this permit, since each of the new natural gas-fired units is not considered a steam generating unit as defined by 40 CFR 60.41c and each unit has a heat input capacity of less than ten (10) MMBtu per hour.
- (b) This requirements of 326 IAC 12 or 40 CFR 60, Subpart MM (60.390 through 60.398), Standards of Performance for the Automobile and Light Duty Truck surface Coating Operations are not included in the permit, because this source does not perform Automobile and Light Duty Truck surface coating.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (4I), (326 IAC 20-85), is not included in the permit, since this source does not coat automobile or light duty truck body parts and is not a major source of HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for surface coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80-1) are not included in the permit, since this source is not a major source of HAPs as defined in 40 CFR 63.
- (f) The requirements of the National Emission Standards for the Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, (326 IAC 20-95), are not included in the permit, since this source is not considered a major source of HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63, Subpart HHHHHH (63.11169 through 63.11180), are not included in the permit, since this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipments, and does not perform spray application of coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrates.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (63.11193 through 63.11237), are not included in the permit, because:
 - (1) each of the natural gas-fired furnaces is not considered a boiler (as defined by 40 CFR 63.11237).
 - (2) each of the natural gas-fired water heaters is considered a gas-fired boiler, as defined by 40 CFR 63.11237, which is specifically exempted from this rule under 40 CFR 63.11195(e).
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX (63.11514 through 63.11523), are not included in the permit, because the operations at this source fall under SIC codes 8734 and 7699 (NAICS codes 541380, 811219, and 811310), which are not one of the nine source categories listed in 40 CFR 63.11514 (see Federal Register, 73 FR 43000, July 23, 2008, for the list of NAICS codes for regulated source categories).
- (j) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability - Individual Sources

Paint Booths

(i) 326 IAC 6.5 (Particulate Matter Limitations)

The requirements of 326 IAC 6.5 apply to facilities located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne, which have the potential to emit one hundred (100) tons or more, or actual emissions of ten (10) tons or more of particulate matter per year. Although the source has potential particulate matter emissions less than one hundred (100) tons per year, actual emissions have the potential to exceed ten (10) tons or more per year. Therefore, the source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from each of the paint booths, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

In order to comply with this requirement, the dry filters associated with the each of the paint booths shall be in operation and control particulate emissions from each of the paint booths at all times that the paint booths are in operation

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

(1) The touch up spray paint booth 3'x3' is not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

(2) The requirements of 326 IAC 8-1-6 do not apply to each of the other paint booths, since these units are subject to the requirements of 326 IAC 8-2-9.

(k) 326 IAC 8-2-9 (Volatile Organic Compounds, Surface Coating emissions limitations: miscellaneous metal coating operations)

(1) Pursuant to 326 IAC 8-2-1(a)(4) and 326 IAC 8-2-9(a)(1), the 3'x3' touch up paint booth and 8'x8' touch up paint booth is not subject to the requirements of 326 IAC 8-2-9, since it has potential VOC emissions of less than fifteen (15) pounds per day before add-on controls.

(2) Pursuant to 326 IAC 8-2-1(a)(4) and 326 IAC 8-2-9(a)(1), the paint booth with automatic arm and the robotic paint booth are each subject to the requirements of 326 IAC 8-2-9, since each booth performs miscellaneous metal coating operations and has actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. This source performs surface coating of metal gas cylinders, which are considered commercial and/or industrial equipment under 326 IAC 8-2-9(a)(1)(D).

(A) Pursuant to 326 IAC 8-2-9, when coating metal parts in the the paint booth with automatic arm and the robotic paint booth, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator in each paint booth.

(B) 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 be limited to, the following:

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

- (ii) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (iii) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (iv) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (v) Minimize VOC emissions from the cleaning of 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.
- (l) There are no other 326 IAC 8 Rules that are applicable to the paint booths.

Shot Blasting

- (m) 326 IAC 6.5 (Particulate Matter Limitations)
The requirements of 326 IAC 6.5 apply to facilities located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne, which have the potential to emit one hundred (100) tons or more, or actual emissions of ten (10) tons or more of particulate matter per year. Although the source has potential particulate matter emissions less than one hundred (100) tons per year, actual emissions have the potential to exceed ten (10) tons or more per year. Therefore, the source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from the shot blasting units, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

In order to comply with this requirement, the dust collectors for particulate control shall be in operation at all times that the shot blasting units are in operation

Buffing

- (n) 326 IAC 6.5 (Particulate Matter Limitations)
The requirements of 326 IAC 6.5 apply to facilities located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne, which have the potential to emit one hundred (100) tons or more, or actual emissions of ten (10) tons or more of particulate matter per year. Although the source has potential particulate matter emissions less than one hundred (100) tons per year, actual emissions have the potential to exceed ten (10) tons or more per year. Therefore, the source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from the buffing operation, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

In order to comply with this requirement, the dust collectors for particulate control shall be in operation at all times that the buffing machines are in operation

Dip Tank

- (o) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The dip tank is not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

- (p) 326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-1(a)(4), this rule applies to facilities located in any county, constructed after July 1, 1990, which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls, and that perform surface coating of metal and/or plastic parts as specified in 326 IAC 8-2-9(a) and (b). The dip tank is not subject to the requirements of 326 IAC 8-2-9, since it has potential VOC emissions of less than fifteen (15) pounds per day before add-on controls.
- (q) There are no other 326 IAC 8 Rules that are applicable to the dip tank.

Natural Gas Combustion

- (r) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)
- (1) The two (2) water heaters are subject to the 326 IAC 6-2-4, because each is a source of indirect heat and was constructed after to September 21, 1983.
- Particulate emissions from the water heaters, shall be limited by the following equation:
- $$Pt = 1.09/Q^{0.26}$$
- where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.
- For Q less than 10 million Btu per hour (MMBtu/hr), Pt shall not exceed 0.60.
- For the water heaters, $Q = 0.199 + 0.074 = 0.273$ MMBtu/hr, which is less than 10 MMBtu/hr. Therefore, particulate matter emissions from the water heaters shall not exceed 0.60 pounds per million Btu (lbs/MMBtu).
- The AP-42 natural gas combustion emission factor for particulate matter (PM) is 0.00186 lb/MMBtu (1.9 lb/MMCF / 1020 MMBtu/MMCF), which is less than the 326 IAC 6-2-4 PM emission limit for each of the water heaters at this source. Therefore, each of water heaters at this source is able to comply with the applicable 326 IAC 6-2-4 PM emission limit without the use of a control device.
- (2) Each of the natural gas-fired furnaces is not subject to the requirements of 326 IAC 6-2, because they each are not an indirect heating unit.
- (s) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Each of the natural gas-fired furnaces at this source is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), each of the natural gas-fired furnaces at this source is also exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions of less than five hundred fifty one thousandths (0.551) pound per hour.
- (t) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, each of the natural gas-fired furnaces and water heaters at this source is not subject to the requirements of 326 IAC 7-1.1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

- (u) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 Each of the natural gas-fired furnaces and water heaters at this source is not subject to the requirements of 326 IAC 8-1-6, since the potential unlimited VOC emissions from each unit is less than twenty-five (25) tons per year.

Compliance Determination, Monitoring and Testing Requirements

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

Emission Units	Control	Parameter	Frequency	Range	Excursions and Exceedances
Shot Blasting Units	Dust Collectors	Water Pressure Drop	Once per day	3.0 to 6.0 inches of water	Response Steps
		Visible Emission Notations	Once per day	Normal/ Abnormal	Response Steps

These monitoring requirements are necessary to document the compliance status with the 326 IAC 6.5 PM emission limitations.

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 24, 2012.

The operation of this source shall be subject to the conditions of the attached proposed MSOP Renewal No. M163-32445-00156. The staff recommends to the Commissioner that this MSOP Renewal be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Adam Wheat at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emissions Calculations
Emission Summary**

**Company Name: Sky Cylinder Testing, Inc.
Source Address: 2220 Lexington Road, Evansville, IN 47720
Permit No.: M163-32544-00156
Reviewer: Adam Wheat**

Uncontrolled Potential Emissions (tons/year)											
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Case HAP	
Surface Coating	9.25	9.25	9.25	0.0	0.0	14.01	0.0	0.0	0.0	0.0	---
Shot Blasting	76.08	76.08	76.08	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Buffing	11.17	1.12	1.12	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Natural Gas Usage	0.01	0.04	0.04	0.003	0.57	0.03	0.48	690	0.01	0.01	Hexane
Total	96.51	86.49	86.49	0.003	0.57	14.04	0.48	690	0.01	0.01	Hexane

Controlled Potential Emissions (tons/year)											
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Case HAP	
Surface Coating	0.09	0.09	0.09	0.0	0.0	14.01	0.0	0.0	0.0	0.0	---
Shot Blasting	0.30	0.30	0.30	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Buffing	0.01	0.001	0.001	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Natural Gas Usage	0.01	0.04	0.04	0.003	0.57	0.03	0.48	690	0.01	0.01	Hexane
Total	0.42	0.44	0.44	0.003	0.57	14.04	0.48	690	0.01	0.01	Hexane

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

Company Name: Sky Cylinder Testing, Inc.
Source Address: 2220 Lexington Road, Evansville, IN 47720
Permit No.: M163-32544-00156
Reviewer: Adam Wheat

Automatic Arm Paint Booth

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
WSR 109 Paint	8.51	70.00%	31.00%	0.05	30	2.16	0.89	1.34	32.04	5.85	3.36	80%
WSR 312 Paint	9.10	66.00%	32.00%	0.05	30	2.07	0.89	1.34	32.04	5.85	4.06	80%
WSR 360 Paint	8.92	67.00%	31.00%	0.05	30	2.16	0.89	1.34	32.04	5.85	3.87	80%
WSR 367 Paint	9.10	66.00%	31.00%	0.05	30	2.13	0.89	1.34	32.04	5.85	4.07	80%
WSR 625 Paint	8.81	68.00%	31.00%	0.05	30	2.15	0.88	1.32	31.68	5.78	3.70	80%
WSR 723 Paint	9.06	66.00%	31.00%	0.05	30	2.13	0.88	1.32	31.68	5.78	4.05	80%
WSR 1050 Paint	8.90	68.00%	30.00%	0.05	30	2.17	0.89	1.34	32.04	5.85	3.74	80%
Worst Case Scenario:								1.34	32.04	5.85	4.07	

Robotic Paint Booth

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
WSR 109 Paint	8.51	70.00%	31.00%	0.05	20	2.16	0.89	0.89	21.36	3.90	2.24	80%
WSR 312 Paint	9.10	66.00%	32.00%	0.05	20	2.07	0.89	0.89	21.36	3.90	2.71	80%
WSR 360 Paint	8.92	67.00%	31.00%	0.05	20	2.16	0.89	0.89	21.36	3.90	2.58	80%
WSR 367 Paint	9.10	66.00%	31.00%	0.05	20	2.13	0.89	0.89	21.36	3.90	2.71	80%
WSR 625 Paint	8.81	68.00%	31.00%	0.05	20	2.15	0.88	0.88	21.12	3.85	2.47	80%
WSR 723 Paint	9.06	66.00%	31.00%	0.05	20	2.13	0.88	0.88	21.12	3.85	2.70	80%
WSR 1050 Paint	8.90	68.00%	30.00%	0.05	20	2.17	0.89	0.89	21.36	3.90	2.49	80%
Worst Case Scenario:								0.89	21.36	3.90	2.71	

3' x 3' Touch Up Paint Booth

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)*	Maximum (unit/hour)*	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
WSR 109 Paint	8.51	70.00%	31.00%	0.023	12.5	2.16	0.89	0.26	6.14	1.12	0.64	80%
WSR 312 Paint	9.10	66.00%	32.00%	0.023	12.5	2.07	0.89	0.26	6.14	1.12	0.78	80%
WSR 360 Paint	8.92	67.00%	31.00%	0.023	12.5	2.16	0.89	0.26	6.14	1.12	0.74	80%
WSR 367 Paint	9.10	66.00%	31.00%	0.023	12.5	2.13	0.89	0.26	6.14	1.12	0.78	80%
WSR 625 Paint	8.81	68.00%	31.00%	0.023	12.5	2.15	0.88	0.25	6.07	1.11	0.71	80%
WSR 723 Paint	9.06	66.00%	31.00%	0.023	12.5	2.13	0.88	0.25	6.07	1.11	0.78	80%
WSR 1050 Paint	8.90	68.00%	30.00%	0.023	12.5	2.17	0.89	0.26	6.14	1.12	0.72	80%
Worst Case Scenario:								0.26	6.14	1.12	0.78	

*Based on 100 units per 8 hour period and 3 ounces of paint per unit.

8' x 8' Touch Up Paint Booth*

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
WSR 109 Paint (Cylinders)*	8.51	70.00%	31.00%	0.05	12.50	2.16	0.89	0.56	13.35	2.44	1.40	80%
WSR 109 Paint (Carts)**	8.51	70.00%	31.00%	0.25	1.25	2.16	0.89	0.28	6.68	1.22	0.70	80%
WSR 312 Paint (Cylinders)*	9.10	66.00%	32.00%	0.05	12.50	2.07	0.89	0.56	13.35	2.44	1.69	80%
WSR 312 Paint (Carts)**	9.10	66.00%	32.00%	0.25	1.25	2.07	0.89	0.28	6.68	1.22	0.85	80%
WSR 360 Paint (Cylinders)*	8.92	67.00%	31.00%	0.05	12.50	2.16	0.89	0.56	13.35	2.44	1.61	80%
WSR 360 Paint (Carts)**	8.92	67.00%	31.00%	0.25	1.25	2.16	0.89	0.28	6.68	1.22	0.81	80%
WSR 367 Paint (Cylinders)*	9.10	66.00%	31.00%	0.05	12.50	2.13	0.89	0.56	13.35	2.44	1.69	80%
WSR 367 Paint (Carts)**	9.10	66.00%	31.00%	0.25	1.25	2.13	0.89	0.28	6.68	1.22	0.85	80%
WSR 625 Paint (Cylinders)*	8.81	68.00%	31.00%	0.05	12.50	2.15	0.88	0.55	13.20	2.41	1.54	80%
WSR 625 Paint (Carts)**	8.81	68.00%	31.00%	0.25	1.25	2.15	0.88	0.28	6.60	1.20	0.77	80%
WSR 723 Paint (Cylinders)*	9.06	66.00%	31.00%	0.05	12.50	2.13	0.88	0.55	13.20	2.41	1.69	80%
WSR 723 Paint (Carts)**	9.06	66.00%	31.00%	0.25	1.25	2.13	0.88	0.28	6.60	1.20	0.84	80%
WSR 1050 Paint (Cylinders)*	8.90	68.00%	30.00%	0.05	12.50	2.17	0.89	0.56	13.35	2.44	1.56	80%
WSR 1050 Paint (Carts)**	8.90	68.00%	30.00%	0.25	1.25	2.17	0.89	0.28	6.68	1.22	0.78	80%
Worst Case Scenario:								0.56	13.35	2.44	1.69	

*Based on 100 units per 8 hour period and 5 gallons of paint per 100 units.

**Based on 10 per 8 hour period and 0.25 gallons per 1 unit.

8'x8' Touch Up Paint Booth is capable of painting both cylinders and cylinder carts. Calculations are shown for both throughputs and worst case scenario is shown.

Dip Tanks

Material	Density (Lb/Gal)	Gal of Mat. (gal/day)	Gal of Mat. (gal/yr)	Safety Factor	Pounds VOC per gallon of coating	Potential VOC pounds per day	Potential VOC pounds per year	Potential VOC tons per year	Transfer Efficiency
Temp-Alert Gloss Shield	8.53	3.12	1138.80	1.5	0.83	3.88	1417.8	0.71	100%

All water based paints. Source can paint only one color at a time in each booth
All coatings used contain no Hazardous Air Pollutants (HAPs)

Total Uncontrolled PTE (tons/year)	VOC	PM
	14.01	9.25
Dry filter Control Efficiency		99.00%
Total Controlled PTE (tons/year)		0.09

METHODOLOGY (Paint Booths)

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 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lb/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)

METHODOLOGY (Dip Tanks)

Gal. of Material (gal/yr) = 260 (gal/yr) / 2000 (hr/yr) * 8760 (hrs/yr)
Safety Factor used due to the estimated value for Gallons of Material.
Potential VOC pounds per year = Gallon of Material(gal/yr) * Safety Factor * Pounds VOC per gallon of coating (lbs/gal)
Potential VOC tons per year = Potential VOC pounds per year (lbs/yr) / (2000 lbs/ton)

**Appendix A: Emission Calculations
Particulate Emissions From Shotblasting Operations**

**Company Name: Sky Cylinder Testing, Inc.
Source Address: 2220 Lexington Road, Evansville, IN 47720
Permit No.: M163-32544-00156
Reviewer: Adam Wheat**

Shotblasting Operations 1A

Shotblasting Operations 1A	Process Weight Rate (lbs/hour)	Shotblast dust Collected* (lbs/hour)	Collection/ Control Efficiency (%)	Uncontrolled PTE of PM/PM10/PM2.5 (tons/year)	Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hour)	Controlled PTE of PM/PM10/PM2.5 (tons/year)	Controlled PTE of PM/PM10/PM2.5 (lbs/hour)
Dust Collector	6,621.00	17.30	99.6%	76.08	17.37	0.30	0.069
PTE TOTALS:				76.08		0.30	
ACTUAL TOTALS**:				36.13		0.14	

All shotblast dust collected is assumed to be PM/PM10/PM2.5. PM10 and PM2.5 emissions assumed equal to PM emissions.

Total number of Cylinders treated during shotblast = 3304 and each cylinder weighs 160 lbs (528,640 pounds for 5 days and 16 hours per day)
Dust collected from shot blast operation = 1050 lbs based on 5 days and 16 hours per day

Raw throughput of shots including cylinders and dust collected for the shotblast operations = 528,640 + 1050 = 529,690 pounds for 5 days and 16 hours per day = 6,621 pounds per hour of throughput.

*Based on reported amount of shotblast dust collected 1,384 pounds for 5 days and 16 hours per day of operation = $1384 \times (1/16) \times (1/5) = 17.30$ lbs/hr

Dust collected is based on reported operation of 5 days per week, two shifts (8 hours each) per day

**Actual Totals are based on 4160 hours per year (52 weeks/year x 5 days/week x 16 hours/day).

Methodology

Uncontrolled PTE (tons/year) = Shotblast dust Collected (lbs/hour) / (Control Efficiency %) x 8760 (hours/year) x 1 ton/2000 lbs

Uncontrolled PTE (lbs/hour) = Shotblast dust Collected (lbs/hour) / (Control Efficiency %)

Controlled PTE (tons/year) = Uncontrolled PTE (tons/year) x (1 - Control Efficiency %)

Controlled PTE (lbs/hour) = Uncontrolled PTE (lbs/hour) x (1 - Control Efficiency %)

Actual Emissions Uncontrolled (tons/year) = Uncontrolled PTE (tons/year) x (4160 hours/year) / (8760 hours/year)

Actual Emissions Controlled (tons/year) = Controlled PTE (tons/year) x (4160 hours/year) / (8760 hours/year)

**Appendix A: Emission Calculations
Particulate Emissions From Buffing Operations**

Company Name: Sky Cylinder Testing, Inc.
Source Address: 2220 Lexington Road, Evansville, IN 47720
Permit No.: M163-32544-00156
Reviewer: Adam Wheat

Buffing Operations

	Process Weight Rate lbs/hr*	Emission Factor (PM) lbs/ton	Emission Factor (PM10 and PM2.5) lbs/ton	Uncontrolled PTE of PM tons/year	Uncontrolled PTE of PM10/PM2.5 tons/year	Control Efficiency (%)	Controlled PTE of PM tons/year	Controlled PTE of PM10/PM2.5 tons/year
Buffing Operations	300	17	1.7	11.17	1.12	99.9%	0.01	0.001
PTE TOTALS:				11.17	1.12		0.01	0.001

Methodology

*Process weight rate based on a processing of 2400 lbs per 8-hour period (300 units per 8-hour period)

Uncontrolled PTE of PM (tons/year) = Process Weight Rate (lbs/hr) * (8760 hrs/yr) / (2000 lbs/ton) * Emission Factor (PM) (lbs/ton) / (2000 lbs/ton)

Uncontrolled PTE of PM (tons/year) = Process Weight Rate (lbs/hr) * (8760 hrs/yr) / (2000 lbs/ton) * Emission Factor (PM10 and PM2.5) (lbs/ton) / (2000 lbs/ton)

Controlled PTE of PM = Uncontrolled PTE of PM (tons/year) * (1 - Control Efficiency)

Controlled PTE of PM2.5/PM10 = Uncontrolled PTE of PM (tons/year) * (1 - Control Efficiency)

Emission Factors from WebFIRE for SCC# 3-04-003-40

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

Company Name: Sky Cylinder Testing, Inc.
Source Address: 2220 Lexington Road, Evansville, IN 47720
Permit No.: M163-32544-00156
Reviewer: Adam Wheat

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Units:
0.400	3.5	Four (4) furnaces @ 0.1 MMBtu/hr each
0.075	0.7	One (1) furnace @ 0.075 MMBtu/hr
0.400	3.5	One (1) furnace @ 0.4 MMBtu/hr
0.030	0.3	One (1) furnace @ 0.03 MMBtu/hr
0.126	1.1	One (1) furnace @ 0.126 MMBtu/hr
0.199	1.7	One (1) water heater @ 0.199 MMBtu/hr
0.074	0.6	One (1) water heater @ 0.074 MMBtu/hr
1.304	11.42	

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.01	0.04	0.04	0.003	**see below	0.57	0.48

*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

Hazardous Air Pollutants

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Potential Emission in tons/yr	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
	1.2E-05	6.9E-06	4.3E-04	0.01	1.9E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Potential Emission in tons/yr	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
	2.9E-06	6.3E-06	8.0E-06	2.2E-06	1.2E-05
				TOTAL	0.01

Methodology

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

Greenhouse Gases (GHGs)

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
Potential Emission in tons/yr	120,000	2.3	2.2
	685	0.01	0.01
Summed Potential Emissions in tons/yr	685		
CO2e Total in tons/yr	690		

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
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: Jon Grimmer
Sky Cylinder Testing, Inc.
2220 Lexington Road
Evansville, IN 47720

DATE: April 9, 2013

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

SUBJECT: Final Decision
MSOP Renewal
163-32445-00156

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

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

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

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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April 9, 2013

TO: Willard Library of Evansville

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

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

Applicant Name: Sky Cylinder Testing, Inc.
Permit Number: 163-32445-00156

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

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 4/9/2013 Sky Cylinder Testing, Inc. 163-32445-00156 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	

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1		Jon Grimmer Sky Cylinder Testing, Inc. 2220 Lexington Rd Evansville IN 47720 (Source CAATS) via confirmed delivery										
2		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 (Local Official)										
3		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)										
4		Willard Library of Evansville 21 First Ave Evansville IN 47710-1294 (Library)										
5		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
6		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)										
7		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 (Affected Party)										
8		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
9		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 (Local Official)										
10		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)										
11		Melinda Paul HSMF, LLC 12835 Saint Wendel Road Evansville IN 47720 (Affected Party)										
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11			

