



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

Michael R. Pence  
*Governor*

Thomas W. Easterly  
*Commissioner*

### NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and  
Minor Source Operating Permit (MSOP)

for Circle-Proscos, Inc. in Monroe County

MSOP No. M105-32470-00049

The Indiana Department of Environmental Management (IDEM) has received an application from Circle-Proscos, Inc. located at 401 Gates Drive, Bloomington, IN 47404 for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Circle-Proscos, Inc. to construct and operate a new stationary petroleum products manufacturer and metal parts coating operation.

IDEM is aware that the source has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft MSOP contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Monroe County Public Library  
303 East Kirkwood Avenue  
Bloomington, IN 47408

and

IDEM Southeast Regional Office  
820 West Sweet Street  
Brownstown, Indiana 47220-9557

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

#### **How can you participate in this process?**

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you



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do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M105-32470-00049 in all correspondence.

**Comments should be sent to:**

Kristen Willoughby  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension (3-3031)  
Or dial directly: (317) 233-3031  
Fax: (317)-232-6749 attn: Kristen Willoughby  
E-mail: [kwilloug@idem.IN.gov](mailto:kwilloug@idem.IN.gov)

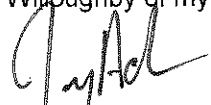
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: [www.idem.in.gov](http://www.idem.in.gov).

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Southeast Regional Office indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions please contact Kristen Willoughby or my staff at the above address.



Jenny Acker, Section Chief  
Permits Branch  
Office of Air Quality

JA/kw



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Commissioner

## DRAFT

# New Source Construction and Minor Source Operating Permit

## OFFICE OF AIR QUALITY

**Circle-Prosc0, Inc.**  
**401 Gates Drive**  
**Bloomington, Indiana 47404**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 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.: M105-32470-00049	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary petroleum products manufacturer and metal parts coating operation.

Source Address:	401 Gates Drive, Bloomington, Indiana 47404
General Source Phone Number:	(812) 339-3653
SIC Code:	3479, 3585, 2992
County Location:	Monroe
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

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

- (a) One (1) powder coat booth, identified as EU-1, constructed in 2000, using electrostatic air atomization technology, coating a maximum of 15 metal units per month, controlled by a fabric filter (identified as EC-1), and exhausting to stack M-21.
- (b) One (1) thermal degreasing and flux coating operation, identified as EU-2, constructed in 2003, with a maximum throughput of 66,096 metal units per hour, consisting of:
  - (1) One (1) natural gas-fired conveyORIZED thermal degreaser, with a maximum of 2.4 MMBtu/hr, controlled by one (1) 4.0 MMBtu/hr natural gas-fired thermal oxidizer (identified as EU-3), and exhausting to stack M-3
  - (2) One (1) main flux coating operation, consisting of four (4) HVLP guns, controlled by a fabric filter (identified as EC-2), and exhausting to stacks M-8.
  - (3) One (1) side flux coating operation, consisting of one (1) HVLP gun, controlled by a fabric filter (identified as EC-2), and exhausting to stacks M-8.
  - (4) One (1) small parts flux coating operation, consisting of one (1) HVLP gun, controlled by a fabric filter (identified as EC-2), and exhausting to stacks M-8.
  - (5) One (1) natural gas-fired dry-off oven, with a maximum heat input of 1.2 MMBtu/hr, and exhausting to stacks M-5.
- (c) One (1) lubricant mixing operation, identified as EU-3, constructed in 2000, with a maximum of 24 batches mixed per day, exhausting to inside but vented to vents M-29 and M-30.

- (d) Two (2) natural gas-fired boilers, identified as B-1 and B-2, constructed in 2000, with a maximum heat input of 2.00 MMBtu/hr, and exhausting to stack M-39.
- (e) One (1) coil lubricating operation, identified as EU-4, constructed in 2011, with a maximum throughput of 186 coils per day, using a 540 cfm air compressor, and controlled by a chiller.
- (f) Combustion source flame safety purging on startup.
- (g) Vessels storing lubricating oils, machining oils, and machining fluids. Storage vessels are totes and barrels each with a maximum storage capacity less than 75 m<sup>3</sup>.
- (h) Packaging lubricants.
- (i) Filling drums, pails, or other packaging containers with lubricating oils.
- (j) Production related activities, including the following:
  - (1) Application of oils, greases, lubricants, and nonvolatile material as temporary protective coatings.
  - (2) Cleaners and solvents characterized as having a vapor pressure equal to or less than:
    - (A) two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or
    - (B) seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit);the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. (*Windex*)
- (k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (l) Paved and unpaved roads and parking lots with public access.
- (m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks.

## SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

### B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, M105-32470-00049, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

### B.6 Enforceability

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



**B.7 Severability**

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

**B.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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

**B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (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.11 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M105-32470-00049 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.13 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.14 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.15 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.16 Source Modification Requirement

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

B.17 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.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (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.19 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (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.20 Credible Evidence [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

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

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

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

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

**C.3 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

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

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

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps**

**C.13 Response to Excursions or Exceedances**

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

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

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.



- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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

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

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

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (b) One (1) thermal degreasing and flux coating operation, identified as EU-2, constructed in 2003, with a maximum throughput of 66,096 metal units per hour, consisting of:
- (1) One (1) natural gas-fired conveyORIZED thermal degreaser, with a maximum of 2.4 MMBtu/hr, controlled by one (1) 4.0 MMBtu/hr natural gas-fired thermal oxidizer (identified as EU-3), and exhausting to stack M-3
  - (2) One (1) main flux coating operation, consisting of four (4) HVLP guns, controlled by a fabric filter (identified as EC-2), and exhausting to stacks M-8.
  - (3) One (1) side flux coating operation, consisting of one (1) HVLP gun, controlled by a fabric filter (identified as EC-2), and exhausting to stacks M-8.
  - (4) One (1) small parts flux coating operation, consisting of one (1) HVLP gun, controlled by a fabric filter (identified as EC-2), and exhausting to stacks M-8.
  - (5) One (1) natural gas-fired dry-off oven, with a maximum heat input of 1.2 MMBtu/hr, and exhausting to stacks M-5.

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

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

#### D.1.1 Particulate Emissions Limitations [326 IAC 6-3-2]

- (a) Particulate from the each of the three (3) flux coating operations (main flux coating operation, side flux coating operation, and small parts flux coating operation) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (d) Two (2) natural gas-fired boilers, identified as B-1 and B-2, constructed in 2000, with a maximum heat input of 2.00 MMBtu/hr, and exhausting to stack M-39.

(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 Emissions [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the 2.00 MMBtu/hr boilers (identified as B-1 and B-2) shall be limited by the following equation:

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

Where Pt = PM emission rate limit (lbs/MMBtu)  
= 0.72 lbs/MMBtu  
Q = total source heat input capacity (MMBtu/hr)  
= 4MMBtu/hr

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (e) One (1) coil lubricating operation, identified as EU-4, constructed in 2011, with a maximum throughput of 186 coils per day, using a 540 cfm air compressor, and controlled by a chiller.

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

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the coil coating operation during cleanup shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.3.3 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.3.1 shall be determined using the following equation:

$$D_{VOC} = (L - R) / C$$

Where:  $D_{VOC}$  = VOC discharged to the atmosphere in lb of VOC / gallon of coating excluding water

L = Lubricant applied to tubes per month in pounds per month.

R = Lubricant recovered from tubes per month in pounds per month.

C = Lubricant applied to tubes per month in gallons per month.

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

#### D.3.4 Record Keeping Requirement

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount of lubricant applied to tubes each month in pounds and gallons.
- (2) The amount of lubricant recovered from tubes each month in pounds.

- (3) The VOC discharge to the atmosphere in lb of VOC / gallon of coating excluding water.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

**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).

<b>Company Name:</b>	Circle-Prosc0, Inc.
<b>Address:</b>	401 Gates Drive
<b>City:</b>	Bloomington, Indiana 47404
<b>Phone #:</b>	(812) 339-3653
<b>MSOP #:</b>	M105-32470-00049

I hereby certify that Circle-Prosc0, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Circle-Prosc0, Inc. is :

in compliance with the requirements of MSOP M105-32470-00049.

not in compliance with the requirements of MSOP M105-32470-00049.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**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:

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

Circle-Prosc0, Inc.  
401 Gates Drive  
Bloomington, Indiana 47404

Affidavit of Construction

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

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_  
(Company Name)
4. I hereby certify that Circle-Prosc0, Inc. 401 Gates Drive, Bloomington, Indiana 47404, has constructed and will operate a petroleum products manufacturer and metal parts coating operation on \_\_\_\_\_ in conformity with the requirements and intent of the permit application received by the Office of Air Quality on October 31, 2012 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M105-32470-00049, Plant ID No. 105-00049 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

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

STATE OF INDIANA)  
)SS

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

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

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

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

Technical Support Document (TSD) for a New Source Construction and  
Minor Source Operating Permit (MSOP)

**Source Description and Location**

<b>Source Name:</b>	<b>Circle-Prosc0, Inc.</b>
<b>Source Location:</b>	<b>401 Gates Drive, Bloomington, IN 47404</b>
<b>County:</b>	<b>Monroe</b>
<b>SIC Code:</b>	<b>3479, 3585, 2992</b>
<b>Operation Permit No.:</b>	<b>M105-32470-00049</b>
<b>Permit Reviewer:</b>	<b>Kristen Willoughby</b>

On October 31, 2012, the Office of Air Quality (OAQ) received an application from Circle-Prosc0, Inc. related to the construction and operation of a new petroleum products manufacturer and metal parts coating operation.

**Source Definition**

Circle-Prosc0, Inc. operates two plants in Bloomington. The Headquarters Plant (source ID 105-00049), located at 401 Gates Drive, produces lubricants and coats metal parts. The West Plant, located at 303 N. Curry Pike, serves as the warehouse for the Gates Drive plant and also lubricates aluminum coils. The plants are less than a mile apart. IDEM, OAQ has examined whether these plants are part of the same source. The term "source" is defined at 326 IAC 2-1-73. In order for two plants to be considered one source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for another; and,
- (3) the plants must be located on contiguous or adjacent properties.

The plants are both owned by Circle-Prosc0, Inc. Therefore, the two sources are under common ownership, meeting the first part of the source definition.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at [http://www.osha.gov/pls/imis/sic\\_manual.html](http://www.osha.gov/pls/imis/sic_manual.html) on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant. The Headquarters Plant principal activity is the coating of its customer's parts with flux. It has the two-digit SIC Code 34, for the Major Group Fabricated Metal Products, Except Machinery and Transportation Equipment, which includes the four-digit SIC Code 3479 for Coating, Engraving, and Allied Services, Not Elsewhere Classified. The West Plant's principal activity is the lubricating of aluminum HVAC coils for its customers. It has the two-digit SIC Code 35, for the Major Group Industrial and Commercial Machinery and Computer Equipment, which includes the four-digit SIC Code 3585 for Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. The Headquarters Plant's main output is the degreasing and fluxing of parts. After the parts are fluxed they are transported by truck to the West Plant for shipping to customers. The Headquarters Plant also produces lubricants. Less than 17% of its lubricant production goes to the West Plant where it is used to

lubricate aluminum coils. Altogether, more than 50% of the Headquarter Plant's total output goes to the West Plant. The Headquarters Plant and the West Plant have a support relationship.

The West Plant's main activity is lubricating aluminum HVAC coils. The coils are shipped from customers directly to the West Plant. The West Plant ships the coils back to the customers when lubrication is complete. None of the coils goes to the Headquarters Plant. The West Plant does receive and store all the parts that will be degreased and fluxed at the Headquarters Plant. All of these parts are transported by truck to the Headquarters Plant. The output of these parts to the Headquarters Plant is less than 50% of the total output of the West Plant. The West Plant is not a support facility.

While the plants do not have the same two-digit SIC Code, they do have a support relationship, meeting the second part of the source definition.

The last part of the definition is whether the plants are on the same, contiguous or adjacent properties. The plants are not located on the same or contiguous properties. Therefore IDEM must determine if the plants are located on adjacent properties.

The term "adjacent" is not defined in Indiana's rules. IDEM's Nonrule Policy Document Air-005 is guidance regarding the definition of "major source" in 326 IAC 2-7-1(22). However, since the definitions of source and major source are almost identical, Air-005 is relevant to determining when two properties are adjacent. Air-005 adds the following guidance:

- properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

The U.S. EPA has a similar view on how to interpret the term "adjacent" when defining a source. Two U.S. EPA letters; the May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality, and the U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, discuss the term "adjacent" as it is used in making major source determinations. These letters are not binding on IDEM but they are persuasive for two reasons. The letters follow the guidance in NPD Air-005 that IDEM will examine both the distance between the sources and their relationship and, secondly, they illustrate a longstanding U.S. EPA analysis used to determine if two sources are "adjacent" going back to the preamble to the 1980 NSR program definition of "major source". U.S. EPA's consistent approach is that any evaluation of what is "adjacent" must relate to the guiding principal of a common sense notion of "source".

All IDEM evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

- (1) Are materials routinely transferred between the plants?
- (2) Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
- (3) Is the production process itself split in any way between the plants?

These questions focus on whether the separate plants are so interrelated that they are functioning as one plant, and whether the distance between them is small enough that it enables them to operate as one plant. U.S. EPA Assistant Administrator Gina McCarty issued a memorandum on September 22, 2009 that confirmed U.S. EPA's view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the plants are adjacent.

The two plants are located on properties that are over 563 yards (.32 miles) apart with a shortest travel distance of 1400 yards (.8 miles). The parts that are warehoused at the West Plant are routinely transferred between the plants. The plants do not share any production workers and have separate managers. The degreasing and fluxing production process is not split at all between the plants, since the material transfers for that process are solely for the warehousing of parts. The proprietary coil lubricant manufactured at the Headquarters Plant is used in the coil lubricating production process at the West Plant. The plants are located fairly close to one another. Considering all of these factors, IDEM, OAQ finds that the plants are located on adjacent properties, so the third part of the source definition is met.

The plants meet all three elements of the source definition. Therefore, IDEM, OAQ finds that the Circle-Prosc0 plants at 401 Gates Drive and 303 North Curry Pike are part of the same source.

<b>Existing Approvals</b>
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There have been no previous approvals issued to this source.

<b>County Attainment Status</b>
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The source is located in Monroe County.

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

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Monroe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  
- (b) **PM<sub>2.5</sub>**  
 Monroe County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
  
- (c) **Other Criteria Pollutants**  
 Monroe 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 Circle-Prosc0, Inc. on October 31, 2012, relating to the construction and operation of a new petroleum products manufacturer and metal parts coating operation.

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

- (a) One (1) powder coat booth, identified as EU-1, constructed in 2000, using electrostatic air atomization technology, coating a maximum of 15 metal units per month, controlled by a fabric filter (identified as EC-1), and exhausting to stack M-21.
- (b) One (1) thermal degreasing and flux coating operation, identified as EU-2, constructed in 2003, with a maximum throughput of 66,096 metal units per hour, consisting of:
  - (1) One (1) natural gas-fired conveyORIZED thermal degreaser, with a maximum of 2.4 MMBtu/hr, controlled by one (1) 4.0 MMBtu/hr natural gas-fired thermal oxidizer (identified as EU-3), and exhausting to stack M-3
  - (2) One (1) main flux coating operation, consisting of four (4) HVLP guns, controlled by a fabric filter (identified as EC-2), and exhausting to stacks M-8.
  - (3) One (1) side flux coating operation, consisting of one (1) HVLP gun, controlled by a fabric filter (identified as EC-2), and exhausting to stacks M-8.
  - (4) One (1) small parts flux coating operation, consisting of one (1) HVLP gun, controlled by a fabric filter (identified as EC-2), and exhausting to stacks M-8.
  - (5) One (1) natural gas-fired dry-off oven, with a maximum heat input of 1.2 MMBtu/hr, and exhausting to stacks M-5.
- (c) One (1) lubricant mixing operation, identified as EU-3, constructed in 2000, with a maximum of 24 batches mixed per day, exhausting to inside but vented to vents M-29 and M-30.
- (d) Two (2) natural gas-fired boilers, identified as B-1 and B-2, constructed in 2000, with a maximum heat input of 2.00 MMBtu/hr, and exhausting to stack M-39.
- (e) One (1) coil lubricating operation, identified as EU-4, constructed in 2011, with a maximum throughput of 186 coils per day, using a 540 cfm air compressor, and controlled by a chiller.
- (f) Combustion source flame safety purging on startup.
- (g) Vessels storing lubricating oils, machining oils, and machining fluids. Storage vessels are totes and barrels each with a maximum storage capacity less than 75 m<sup>3</sup>.
- (h) Packaging lubricants.

- (i) Filling drums, pails, or other packaging containers with lubricating oils.
- (j) Production related activities, including the following:
  - (1) Application of oils, greases, lubricants, and nonvolatile material as temporary protective coatings.
  - (2) Cleaners and solvents characterized as having a vapor pressure equal to or less than:
    - (A) two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or
    - (B) seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit);the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. (*Windex*)
- (k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (l) Paved and unpaved roads and parking lots with public access.
- (m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks.

<b>“Integral Part of the Process” Determination</b>
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The Permittee has submitted the following information to justify why the dry filters should be considered an integral part of the powder coat booth:

- (a) The primary purpose for the filters is to capture particular matter from the powder paint used in the booth and to protect the vent fan. The vent fan is there to provide negative pressure on the room to capture overspray in the filter.
- (b) No product is recovered for reuse by the paint filters.
- (c) Due to the need to prevent damage to the exhaust fan the filters would be installed regardless of air quality regulations.

IDEM, OAQ has evaluated the information submitted and has determined that the dry filters should not be considered an integral part of the powder coat booth. This determination is based on the fact that the filters do not need to operate at the same level of control to keep an exhaust fan from clogging to the point of making it non-operational as they do for air compliance. Therefore, the permitting level will be determined using the potential to emit before the dry filters.

The Permittee has submitted the following information to justify why the dry filters should be considered an integral part of the flux coating operation:

- (a) The primary purpose for the flux line filters is to capture excess flux and prevent damage to the flux exhaust blower and piping.
- (b) The filters are not used to recover product for reuse.
- (c) Due to the need to prevent damage to the exhaust fan the filters would be installed regardless of air quality regulations.

IDEM, OAQ has evaluated the information submitted and has determined that the dry filters should not be considered an integral part of the flux coating operation. This determination is based on the fact that the filters do not need to operate at the same level of control to keep a flux exhaust blower from clogging to the point of making it non-operational as they do for air compliance. Therefore, the permitting level will be determined using the potential to emit before the dry filters.

The Permittee has submitted the following information to justify why the thermal oxidizer should be considered an integral part of the thermal degreaser:

- (a) The primary purpose of the thermal oxidizer is to lower the emissions from the thermal degreaser.
- (b) It is not used to recapture product.
- (c) The thermal oxidizer is not in operation at this time. It is primarily installed to lower emissions from the thermal degreaser and would not be installed other than to meet air quality requirement.

IDEM, OAQ has evaluated the information submitted and has determined that the thermal oxidizer should not be considered an integral part of the thermal degreaser. This determination is based on the fact that the Permittee has stated the thermal oxidizer would not be installed other than to meet air quality requirements. Therefore, the permitting level will be determined using the potential to emit before the thermal oxidizer.

The Permittee has submitted the following information to justify why the chiller should be considered an integral part of the coil coating operation:

- (a) The chiller was designed so the process cannot operate without it.
- (b) The chiller was ordered prior to this permitting action and was installed to recapture the lube used in the coil coating process.
- (c) Based on a cost analysis, the annual cost savings of the chiller is estimated to be \$38,640 after all expenses related to the purchase and operation of the device.

IDEM, OAQ has evaluated these justifications and determined that the chiller controlling the coil coating operation is not an integral part of the process. This determination is based on the following:

- (a) The coil coating operation has been in operation for over two (2) years without the chiller. Therefore, the coil coating operate can operate without the chiller.
- (b) If a larger air flow was introduced to the system or more coils coated per hour than used in the cost analysis, then the cost savings and the recapture rate would decrease. There is nothing which prevents the Permittee from coating more units per hour or adding additional air compressor capacity.

Therefore, the permitting level will be determined using the potential to emit before the chiller.

#### **Enforcement Issues**

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

#### **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	48.12
PM10 <sup>(1)</sup>	48.35
PM2.5	48.34
SO <sub>2</sub>	0.03
NO <sub>x</sub>	4.98
VOC	98.91
CO	4.18
GHGs as CO <sub>2</sub> e	11,014
Single HAP	<10
Total HAPs	<25

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

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM10, PM2.5, and VOC 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.
- (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 CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) 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 Standard for Fossil-Fuel-Fired Steam Generators, 40 CFR 60, Subpart D (326 IAC 12), are not included in the permit, since this source does not have any steam generating units with a heat input greater than 250 MMbtu/hr.
- (b) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db (326 IAC 12), are not included in the permit, since this source does not have any steam generating units with a heat input greater than 100 MMbtu/hr.
- (c) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in

the permit, since this source does not have any steam generating units with a heat input greater than 10 MMBtu/hr.

- (d) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit, since this source does not have any storage vessels with a capacity greater than or equal to 75 cubic meters.
- (e) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT, (326 IAC 12), are not included in the permit, since the Permittee does not have a metal coil surface coating operation as defined in 40 CFR 60.461.
- (f) There are no other 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)

- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit, since this source because the source does not perform paint stripping, auto body refinishing, and does not spray apply any coatings containing chromium, lead, manganese, nickel, or cadmium.
- (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, are not included in the permit, since the boilers are natural gas fired and pursuant to 40 CFR 63.11195(e) gas-fired boilers are not to 40 CFR 63, Subpart JJJJJJ.
- (i) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

#### Compliance Assurance Monitoring (CAM)

- (j) 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.

<b>State Rule Applicability Determination</b>
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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 CO<sub>2</sub>e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source

is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. 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.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because potential fugitive particulate emissions are less than 25 tons per year.
- (i) 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)  
The source is not subject to the requirements of 326 IAC 6.8-10, because it is not located in Lake County.
- (j) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)  
The source is not subject to the requirements of 326 IAC 8-9, because it is not located in Clark, Floyd, Lake, or Porter County.
- (k) 326 IAC 8-20 (Industrial Wastewater)  
The source is not subject to the requirements of 326 IAC 8-20, because it is not located in Lake or Porter County.
- (l) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (m) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

Powder Coat Booth (EU-1)

- (n) 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Sources)  
The powder coat booth (EU-1) has potential particulate emissions less than 0.551 pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the powder coat booth (EU-1) is exempt from the requirements of 326 IAC 6-3.
- (o) 326 IAC 8-1-6 (BACT)  
The powder coat booth (EU-1) uses coatings that do not contain any VOC. Therefore, EU-1 is not subject to the requirements of 326 IAC 8-1-6.
- (p) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operation)  
The powder coat booth (EU-1) uses coatings that do not contain any VOC. Therefore, EU-1 is not subject to the requirements of 326 IAC 8-2-9.

Thermal Degreasing and Flux Coating Operation (EU-2)

- (q) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)  
The thermal degreaser, thermal oxidizer and the dry-off oven are not subject to the requirements of 326 IAC 6-2 because they are not sources of indirect heating.
- (r) 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Sources)
  - (1) Particulate from the each of the three (3) flux coating operations (main flux coating operation, side flux coating operation, and small parts flux coating operation) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
  - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
    - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
    - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (3) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
  - (4) The thermal degreaser, thermal oxidizer and the dry-off oven are not subject to the requirements of 326 IAC 6-3 because they each have potential particulate matter emissions less than 0.551 pound per hour.
- (s) 326 IAC 8-1-6 (BACT)  
The potential emissions of VOC from EU-2 are less than 25 tons per year. Therefore, EU-2 is not subject to the requirements of 326 IAC 8-1-6.
- (t) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operation)  
The three (3) flux coating operations (main flux coating operation, side flux coating operation, and small parts flux coating operation) use coatings that do not contain any VOC. Therefore, the three (3) flux coating operations are not subject to the requirements of 326 IAC 8-2-9.

### Lubricant Mixing Operation

- (u) 326 IAC 18 (Synthetic Organic Chemical Manufacturing Industry Air Oxidation, Distillation, and Reactor Processes)  
The lubricant mixing operation is not subject to the requirements of 326 IAC 18 because it does not involve air oxidization, distillation, or a reactor process.
- (v) 326 IAC 19 (Control of Volatile Organic Compound Emissions from Process Vents in Batch Operations)  
The lubricant mixing operation is not subject to the requirements of 326 IAC 19 because it is not a batch train process associated with any of the SIC codes 2821, 2833, 2834, 2861, 2865, 2869, or 2879.

### Natural Gas-Fired Boilers (B-1 and B-2)

- (w) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)  
Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

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

Where Pt = PM emission rate limit (lbs/MMBtu)  
Q = total source heat input capacity (MMBtu/hr)

The total source heat input capacity is (2.00)(4) = 4.00 MMBtu/hr. Therefore, the PM emission limit for each of the boilers identified as B-1 and B-2 is calculated as follows:

$$Pt = \frac{1.09}{4.00^{0.26}} = 0.72 \text{ lbs/MMBtu.}$$

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6.

A PM emission limit of 0.72 lbs/MMBtu is equivalent to 66.53 lbs/hr (0.72 lbs/MMBtu x 92.4 MMBtu/hr = 66.53 lbs/hr) of PM emissions from each of the boilers identified as B-1 and B-2. According to the emission calculations in Appendix A, the total PM emissions from all natural gas combustion sources at this facility (including B-1 and B-2) are 0.09 lbs/hr. Therefore, the boilers are capable of complying with the PM requirements in 326 IAC 6-2-4.

### Coil Lubricating Operation

- (x) 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Sources)  
The coil lubricating operation is a flow coat operation. Therefore, pursuant to 326 IAC 6-3-1(b)(7), the coil coating operation is specifically exempt from the requirements of 326 IAC 6-3.
- (y) 326 IAC 8-1-6 (BACT)  
The coil coating operation is subject to the requirements of 326 IAC 8-2-9. Therefore, pursuant to 326 IAC 8-1-6(3)(A), the coil coating operation is not subject to the requirements of 326 IAC 8-1-6.
- (z) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operation)  
(1) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

- (2) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the coil coating operation during cleanup shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Based on the room study the company performed on June 4, 2012, the coil coating operation can comply with this limit.

#### **Compliance Determination, Monitoring and Testing Requirements**

- (a) The compliance determination applicable to the coil lubricating operation is as follows:

Compliance with the VOC content and usage limitations shall be determined using the following equation:

$$D_{VOC} = (L - R) / C$$

Where:  $D_{VOC}$  = VOC discharged to the atmosphere in lb of VOC / gallon of coating excluding water

L = Lubricant applied to tubes per month in pounds per month.

R = Lubricant recovered from tubes per month in pounds per month.

C = Lubricant applied to tubes per month in gallons per month.

#### **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 31, 2012.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M105-32470-00049. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Kristen Willoughby 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) 233-3031 or toll free at 1-800-451-6027 extension 3-3031.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emission Calculations  
Summary**

**Company Name:** Circle-Prosc0, Inc.  
**Address City IN Zip:** 401 North Gates Drive, Bloomington, Indiana 47404  
**Permit Number:** 105-32470-00049  
**Plt ID:** 105-00049  
**Reviewer:** Kristen Willoughby

Potential To Emit (tons/yr)										
Emission Unit / Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs	Total HAPs	Single HAP (Phenol)
Powder Coating	0.04	0.04	0.04	-	-	-	-	-	-	-
Flux Coating	47.92	47.92	47.92	-	-	-	-	-	-	-
Thermal Degreaser	-	-	-	-	-	4.07	-	-	0.04	0.04
Combustion (natural-gas)	0.09	0.38	0.38	0.03	4.98	0.27	4.18	6,014	0.09	-
Lubricant Mixing Operation	-	-	-	-	-	2.33	-	-	2.33	2.33
Coil Lubricating	-	-	-	-	-	91.24	-	-	-	-
Paved Roads	0.07	0.01	3.23E-03	-	-	-	-	-	-	-
*Miscellaneous VOC and HAP Emissions	-	-	-	-	-	1.00	-	-	0.50	0.50
<b>Total</b>	<b>48.12</b>	<b>48.35</b>	<b>48.34</b>	<b>0.03</b>	<b>4.98</b>	<b>98.91</b>	<b>4.18</b>	<b>11,014</b>	<b>2.96</b>	<b>2.87</b>

Controlled Emissions (tons/yr)										
Emission Unit / Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs	Total HAPs	Single HAP (Phenol)
Powder Coating	2.01E-03	2.01E-03	2.01E-03	-	-	-	-	-	-	-
Flux Coating	2.40	2.40	2.40	-	-	-	-	-	-	-
Thermal Degreaser	-	-	-	-	-	4.07	-	-	0.04	0.04
Combustion (natural-gas)	0.09	0.38	0.38	0.03	4.98	0.27	4.18	6,014	0.09	-
Coil Lubricating	-	-	-	-	-	20.00	-	-	-	-
Lubricant Mixing Operation	-	-	-	-	-	2.33	-	-	2.33	2.33
Paved Roads	0.06	0.01	2.97E-03	-	-	-	-	-	-	-
*Miscellaneous VOC and HAP Emissions	-	-	-	-	-	1.00	-	-	0.50	0.50
<b>Total</b>	<b>2.55</b>	<b>2.79</b>	<b>2.78</b>	<b>0.03</b>	<b>4.98</b>	<b>27.67</b>	<b>4.18</b>	<b>11,014</b>	<b>2.96</b>	<b>2.87</b>

Potential to Emit After Issuance (tons/yr)										
Emission Unit / Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs	Total HAPs	Single HAP (Phenol)
Powder Coating	0.04	0.04	0.04	-	-	-	-	-	-	-
Flux Coating	47.92	47.92	47.92	-	-	-	-	-	-	-
Thermal Degreaser	-	-	-	-	-	4.07	-	-	0.04	0.04
Combustion (natural-gas)	0.09	0.38	0.38	0.03	4.98	0.27	4.18	6,014	0.09	-
Coil Lubricating	-	-	-	-	-	91.24	-	-	-	-
Lubricant Mixing Operation	-	-	-	-	-	2.33	-	-	2.33	2.33
Paved Roads	0.07	0.01	3.23E-03	-	-	-	-	-	-	-
*Miscellaneous VOC and HAP Emissions	-	-	-	-	-	1.00	-	-	0.50	0.50
<b>Total</b>	<b>48.12</b>	<b>48.35</b>	<b>48.34</b>	<b>0.03</b>	<b>4.98</b>	<b>98.91</b>	<b>4.18</b>	<b>11,014</b>	<b>2.96</b>	<b>2.87</b>

\*Includes VOC storage vessels, application of temporary protective coatings, packaging lubricants, cleaners and solvents, and wastewater treatment. This is a conservative estimate.

**Appendix A: Emission Calculations  
Powder Coat Booth (EU-1)**

**Company Name: Circle-Proscos, Inc.  
Address City IN Zip: 401 North Gates Drive, Bloomington, Indiana 47404  
Permit Number: 105-32470-00049  
Plt ID: 105-00049  
Reviewer: Kristen Willoughby**

Component	Density (lb/gal)	Transfer Efficiency (%)	Usage (gal/unit)	Maximum Units Coated (unit/hr)	Control Efficiency (%)	Uncontrolled PM/ PM10/ PM2.5 Emissions (lbs/hr)	Uncontrolled PM/ PM10/ PM2.5 Emissions (tons/yr)	Controlled PM/ PM10/ PM2.5 Emissions (tons/yr)
UA001Q Interpon 200 White AV	15.846	95%	0.1300	0.0893	95.00%	9.20E-03	4.03E-02	2.01E-03

Note: UA001Q Interpon 200 White AV contains no VOC or HAP.

**Methodology**

Uncontrolled Particulate (lbs/hr) = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Transfer efficiency)

Uncontrolled Particulate (tpy) = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Controlled Particulate (tpy) = Uncontrolled Particulate (tpy) \* (1 - Control Efficiency (%))



**Appendix A: Emission Calculations  
Powder Coat Booth (EU-1)**

Company Name: Circle-Proscro, Inc.  
Address City IN Zip: 401 North Gates Drive, Bloomington, Indiana 47404  
Permit Number: 105-32470-00049  
Plt ID: 105-00049  
Reviewer: Kristen Willoughby

Powder Coating (EU-1)				
Paint Use	Normal Size	Maximum Size	Units	Notes
Panel Size	15	48	sq. inch	Data provided by source
Thickness of Paint	0.003	0.003	inch	Data provided by source
Panels Painted	15	15	per month	Data provided by source
Panels Painted	0.09	0.09	per hour	Based on 21 days/month and 8 hrs / day
Sides Painted	2	2		Data provided by source
Transfer Efficiency	95%	95%	Powder Coat	AP-42, Table 4.2.2.4-2
Days Per Month	21	21	day	Actual Operation
Application per Month	1	1		
Inch to Gallon (dry)	231	231	cubic inch/gal	Conversion
Density of Paint	15.846	15.846	lb/gal	Data provided by source
Paint Usage	0.01	0.03	cubic inches/hr	
	0.000035	0.00011	gal/hr	
	0.00083	0.00267	gal/day	
	0.61	1.95	gal/month	
	0.04	0.13	gal/unit	
	0.01	0.04	lb/day	
	4.83	15.45	lb/yr	
	0.0006	0.0018	lb/hr	
0.00	0.01	ton/yr		
<b>Unrestricted PM Emissions</b>	<b>0.0001</b>	<b>0.0004</b>	<b>ton PM /yr</b>	
Filter Capture Efficiency (EC-1)	99.03%	99.03%		Data provided by source
	95%	95%		Assumed worst case for PTE calculations
<b>Controlled PM Emissions (PTE)</b>	<b>0.00001</b>	<b>0.0000</b>	<b>ton PM /yr</b>	
Controlled PM Emissions (Actual)	1.2E-06	3.7E-06	ton PM /yr	
VOC Content	0%	0%	by weight	
	0	0	lb/gal	
VOC Emissions	0	0	lb/hr	
	<b>0</b>	<b>0</b>	<b>ton VOC /yr</b>	

**Methodology**

Paint Usage:

Usage (in<sup>3</sup>/hr) = Pane Size (in<sup>2</sup>) x Paint Thickness (in) x No. Panel Painted (panels/month) x 2 sides per panel/[21 (day/month) x 8 (hour/day)]

Usage (gal/hr) = Usage (in<sup>3</sup>/hr) / 231 (in<sup>3</sup>/gal)

Usage (gal/day) = Usage (gal/hr) x 24 hr/day

Usage (gal/month) = (Usage (gal/hr) x 8760 hr/year) / 12 month/year

Usage (gal/unit) = Usage (gal/month) / Usage (units/month)

Usage (lb/day) = Usage (gal/day) x Density (lb/gal)

Usage (lb/yr) = Usage (lb/day) x 365 days/yr

Usage (lb/hr) = Usage (gal/hr) x Density (lb/gal)

Usage (ton/yr) = Usage (lb/hr) x 8760 hr/yr / 2000 lb/ton

Emissions:

Unrestricted PM Emissions (ton/yr) = Paint Usage (ton/yr) x ( 1 - Transfer Efficiency (%) )

Controlled PM Emissions (ton/yr) = Unrestricted PM Emissions (ton/yr) x ( 1 - Filter Capture Efficiency (%) )

Unrestricted VOC Emissions (lb/hr) = VOC Content (lb/gal) x Usage (gal/hr)

Unrestricted VOC Emissions (ton/yr) = Unrestricted VOC Emissions (lb/hr) x 8760 hr/yr / 2000 lb/ton

Notes:

Paint booth is used sporadically usually less than once per month. To calculate the hourly paint use the monthly paint use is divided by 21 work days per month and one 8 hour shift.



**Appendix A: Emission Calculations  
Flux Coating (EU-2)**

**Company Name:** Circle-Prosc0, Inc.  
**Address City IN Zip:** 401 North Gates Drive, Bloomington, Indiana 47404  
**Permit Number:** 105-32470-00049  
**Plt ID:** 105-00049  
**Reviewer:** Kristen Willoughby

**Flux Sold to Flux Line in lbs.**

Month	January	February	March	April	May	June	July	August
Amount Sold (lbs)	2712	2712	2713	2713	2712	1627	2712	2712
	2170	2712	2712	2712	2713	2712	2712	2712
	2712	2712	2712	2712	2712	2060	2712	2712
	2712	2192	2712	2712	2712	-4756	2712	2712
	2170	2170	1248	2712	2712	250	2712	2713
	2712	1654	2712	2712	2712	2712		2387
	2712	2712	2712			1553		2712
						2712		2712
						250		
						2712		
						-375		
						-1271		
						3570		
Total (lbs)	17900	16864	17521	16273	16273	13756	13560	21372
Average Per Month (lbs)	16690							
Flux Density (lb/gal)	10.85							
Average Gallons per Month	1538		Max Gallons	1969.7696				
Average Days Per Month	21			21				
Gallons per day	73.2			93.8				
Parts Per Hour	66,096			66,096				
Gallons Per Part	4.62E-05			5.91E-05				
Gallons Per Year	18458.848			23637.235				

## Appendix A: Emission Calculations

Company Name: Circle-Prosc, Inc.  
Address City IN Zip: 401 North Gates Drive, Bloomington, Indiana 47404  
Permit Number: 105-32470-00049  
Plt ID: 105-00049  
Reviewer: Kristen Willoughby

Degreaser Operations				
Part Name	Cond header	Baffles	Units	Source / Methodology
Belt Speed (Ft/Min)	9.90	9	ft/min	Data Provided By Source
Belt Speed ("/Hr)	7,128	6,480	inches/hr	Data Provided By Source
Part Width (")	0.75		inches	Data Provided By Source
Part Gap (")	0.25		inches	Data Provided By Source
Parts /ft		96		Data Provided By Source
Parts / Hr-Lane	7,128	51,840	parts/hr-lane	Data Provided By Source
# Lanes	2	1		Data Provided By Source
Total Parts / Hr	14,256	51,840	parts/hr	Data Provided By Source
Total Parts / Hr	66,096		part/hour	Data Provided By Source
Changeover / Efficiency Allowance (85%)	12,118	44,064		Data Provided By Source
Surface Area	0.03	0.00	m <sup>2</sup>	Data Provided By Source
Total Area / Hour	412.00	18.15	m <sup>2</sup> /hr	Data Provided By Source
Reduction in Oil (1g to 20mg)	0.98	0.98		Data Provided By Source - based on max load specifications
VOC (g/hr)	403.76	17.79	g/hr	(Total Area / hr) x Reduction in Oil (1 g to 20 mg)
VOC (g/day)	9,690.20	426.99	g/day	VOC (g/hr) x 24 (hr/day)
Total VOC (g/day)	10,117.19		gal/day	Cond header VOC (g/day) + Baffles (g/day)
Total VOC's	0.93		lb/hour	Total VOC (gal/day) x 0.002205 (lb/gal) x 1 day / 24 hr
Total VOC (16 hour day)	14.87		lb/day	Total VOC (gal/day) x 0.002205 (lb/gal) x 16 hr / 24 hr
	0.01		tons/day	Total VOC (lb / 16 hr day) x 1 ton / 2000 lb
*Total VOC (Actual Operating Year)	3,866.79		lb/year	Total VOC (lb / 16 hr day) x 5 (day/week) x 52 (week/yr)
	1.93		tons/year	Total VOC (lb / Actual Operating yr) x 1 ton / 2000 lb
VOC PTE (24 hour day)	22.31		lb/day	Total VOC (gal/day) x 0.002205 (lb/gal)
	0.01		tons/day	VOC PTE (lb/day) x 1 ton / 2000 lb
VOC PTE (24 hours day, 365 day per year)	8,142.57		lb/year	VOC PTE (lb/day) x 365 (day/yr)
	4.07		tons/year	VOC PTE (lb/yr) x 1 ton / 2000 lb
Phenol HAP (<1% VOCs)	81.43		lb/year	VOC PTE (lb/yr) x 1% (MSDS data)
	0.04		tons/year	VOC PTE (ton/yr) x 1% (MSDS data)
Thermal Oxidizer Control	95%			Data Provided By Source
Emissions	0.744		lb/hour	Total VOC (lb/ 16 hr day) x (1 - Control Efficiency)
Emissions	0.097		tons/year	VOC Actual Controlled Emissions (lb/hr) x 1 ton / 2000 lb
VOC Controlled PTE	0.204		tons/year	VOC PTE (ton/yr) x (1 - Control Efficiency)

\* Actual operating year is 16 (hrs/day), 5 (days/week), 52 (week/yr)

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

**Company Name:** Circle-Proscro, Inc.  
**Address City IN Zip:** 401 North Gates Drive, Bloomington, Indiana 47404  
**Permit Number:** 105-32470-00049  
**Plt ID:** 105-00049  
**Reviewer:** Kristen Willoughby

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
2.40 Thermal Degreaser		
1.20 Dry-Off Oven		
4.00 Thermal Oxidizer		
2.00 Boiler (B-1)		
2.00 Boiler (B-2)		
<b>11.6</b>	<b>1020</b>	<b>99.6</b>

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.09	0.38	0.38	0.03	4.98	0.27	4.18

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
PM2.5 emission factor is filterable and condensable PM2.5 combined  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.046E-04	5.977E-05	3.736E-03	8.966E-02	1.694E-04	<b>9.373E-02</b>

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.491E-05	5.479E-05	6.974E-05	1.893E-05	1.046E-04	<b>2.730E-04</b>
						<b>Total HAPs 9.400E-02</b>
						<b>Worst HAP 8.966E-02</b>

Methodology is the same as above.

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

**Greenhouse Gas Calculations**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	5,977	0.11	0.11
Summed Potential Emissions in tons/yr	5,978		
CO2e Total in tons/yr	6,014		

**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  
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission Calculations**

**Company Name:** Circle-Prosc0, Inc.  
**Address City IN Zip:** 401 North Gates Drive, Bloomington, Indiana 47404  
**Permit Number:** 105-32470-00049  
**Pit ID:** 105-00049  
**Reviewer:** Kristen Willoughby

<b>Lubricant Mixing Operation: VOCs &amp; HAPs</b>		
<b>Coils</b>		
Batches per day	26	
VOC Emissions per batch*	0.49	lb VOC lost per batch
HAP Emissions per batch*	0.49	lb HAP lost per batch
VOC Emissions per day	12.74	lb of VOC lost per day
HAP Emissions per day	12.74	lb of HAP lost per day
VOC Emissions per year	2.33	ton of VOC lost per year
HAP Emissions per year	2.33	ton of HAP lost per year

\*All components are weighed before mixing and after. No measurable difference in weight has been found between the two weightings. The scale weights down to 1 pound (normal rounding to the nearest pound). Therefore, a worst case emission of 0.49 lb per batch is assumed.

**Methodology**

Emissions per day = Emissions per batch (lb/batch) \* Batches per day

Emissions per year = Emissions per day (lb/day) \* 326 (day/yr) \* 1 ton / 2000 lbs

## Appendix A: Emission Calculations

Company Name: Circle-Prosc0, Inc.  
 Address City IN Zip: 401 North Gates Drive, Bloomington, Indiana 47404  
 Permit Number: 105-32470-00049  
 Plt ID: 105-00049  
 Reviewer: Kristen Willoughby

Coil Operations: VOCs			
Potential to Emit			
Coils/day (16 hour day)	124		
Coils/day (24 hour day)	186		
Lube delivered per coil	14.5	gallons / coil	
lube lost/coil	1,219	g/coil	
	2.69	lbs/coil	Based on 6/4/12 room study
Actual VOC Emissions (16 hour day)	151,156	g/day	
	333	lbs/day	
	0.17	tons/day	
VOC discharged to atmosphere	0.19	lb of VOC/ gallon of coating excluding	
Actual VOC Emissions (16 hour day, 5 days per week, 52 weeks per year)	86,658	lb/year	
	43	tons/year	
Potential to Emit (PTE) VOC (24 hour day)	500	lb/day	
	0.25	tons/day	
PTE VOC (24 hours day, 365 day per year)	182,481	lb/year	
	91	tons/year	

**Methodology**

Contains <0.4ppm benzene per MSDS.

Actual VOC Emissions(lb / 16 hr day) = Coils/day (16 hour day) x lube lost / coil (lbs/coil)

Actual VOC Emissions (ton / 16 hr day) = Actual VOC Emissions (lb / 16 hr day) x 1 ton / 2000 lbs

VOC discharged to atmosphere (lb/gal) = lube lost/coil (lbs/coil) / lube delivered per coil (gal/coil)

Actual VOC Emissions (lb /5 days a week 52 weeks a year) = Coils/day (16 hour day) x lube lost / coil (lbs/coil) x 5 days / week x 52 weeks / 1 year

Actual VOC Emissions (ton /5 days a week 52 weeks a year) = Actual VOC Emissions (lb / 5 days a week 52 weeks per year) x 1 ton / 2000 lb

PTE VOC (lb/day) = Actual VOC Emissions (lb/16 hr day) x (24 hrs / 16hrs)

PTE VOC (ton/day) = PTE VOC (lb/day) x 1 ton / 2000 lb

PTE VOC (lb/yr) = PTE VOC (lb/day) x 365 (day / yr)

PTE VOC (ton/yr) = PTE VOC (lb/yr) x 1 ton / 2000 lb

### Appendix A: Emission Calculations

**Company Name:** Circle-Prosc0, Inc.  
**Address City IN Zip:** 401 North Gates Drive, Bloomington, Indiana 47404  
**Permit Number:** 105-32470-00049  
**Plt ID:** 105-00049  
**Reviewer:** Kristen Willoughby

#### Information

Production level is 96 coils over a 24 hour period 365 days per year based on the bottleneck throughput created by the chiller.  
 Previous study (6/4/2012) indicates 2.6875 pounds of solvent is lost per coil through the compressed air stream throughout recovery time.  
 Recovery process uses 500 psig compressed air to move solvent out of tube.  
 Duration of compressed air blow is 11 hours.  
 Assumes that 100% of solvent lost is VOCs.  
 Control equipment proposed is a chiller that is designed to reduce the VOC emissions to 20 tons/year based upon the measured losses and air stream flow rate.  
*The rate of emissions from the coil lubrication line is 20 tons/year as per the below design parameters. To increase the potential emissions additional compressors would be needed.*

Coil coating Operation: Controlled VOC Emissions			
Air Stream Flow Rate:	540	cfm	Maximum flow of air from air
Quantity of Solvent Lost per Coil:	2.688	lb/coil	Amount of VOCs lost in air stream from previous study.
Duration of Compressed Air	11	hr	
Maximum coil runs per day	2	/day	
Quantity of coils per CA	48	coils	
Maximum Allowable Quantity of Solvent Lost per	40,000	lb/yr	Target VOC Emissions
Maximum Allowable Quantity of Solvent Lost per	20	ton/yr	
Maximum Allowable Quantity of Solvent Lost per	1.142	lb/coil	
Control Efficiency	42.48%		
Condensation Rate of Solvent from Air Stream:	6.746	lb/hr	Condensate from saturated air stream
Condensation Rate of Solvent from Air Stream:	59,095	lb/yr	

*Maximum allowable quantity of solvent from air stream* = Maximum allowable quantity of solvent lost per year / (Quantity of Coils x Maximum Runs Per Day x 365 days/year)

*Condensation rate of solvent from air stream* = (Quantity of solvent lost per coil - Maximum allowable quantity of solvent lost per coil) x Quantity of coils per CA blow period / Duration of compressed blow



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

**Company Name: Circle-Prosc0, Inc.**  
**Address City IN Zip: 401 North Gates Drive, Bloomington, Indiana 47404**  
**Permit Number: 105-32470-00049**  
**Pit ID: 105-00049**  
**Reviewer: Kristen Willoughby**

**Paved Roads at Industrial Site**

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one way distance (feet/trip)	Maximum one way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Truck (entering plant) (one-way trip)	16.0	1.0	16.0	40.0	640.0	200	0.038	0.6	221.2
Truck (leaving plant) (one-way trip)	16.0	1.0	16.0	40.0	640.0	200	0.038	0.6	221.2
<b>Total</b>			<b>32.0</b>		<b>1280.0</b>			<b>1.2</b>	<b>442.4</b>

Average Vehicle Weight Per Trip =  $\frac{40.0}{1}$  tons/trip  
 Average Miles Per Trip =  $\frac{0.04}{1}$  miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	40.0	40.0	40.0	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubitiguous Baseline Silt Loading Values of paved roads (AP-42 Table 13.2.1)

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

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
 where p =  $\frac{120}{365}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2);  
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	0.30	0.06	0.01	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.27	0.05	0.01	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Truck (entering plant) (one-way trip)	0.03	0.01	1.62E-03	0.03	0.01	1.48E-03
Truck (leaving plant) (one-way trip)	0.03	0.01	1.62E-03	0.03	0.01	1.48E-03
	<b>0.07</b>	<b>0.01</b>	<b>3.23E-03</b>	<b>0.06</b>	<b>0.01</b>	<b>2.97E-03</b>

**Methodology**

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

**Abbreviations**

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)  
 PTE = Potential to Emit

**Appendix A: Emission Calculations**

**Company Name:** Circle-Prosc0, Inc.  
**Address City IN Zip:** 401 North Gates Drive, Bloomington, Indiana 47404  
**Permit Number:** 105-32470-00049  
**Plt ID:** 105-00049  
**Reviewer:** Kristen Willoughby

**Coil Coating Reclaim Cost Analysis**

Loss per coil(lbs)	2.688
Solvent Price(\$/lb)	\$ 1.06
Coils per Day	96
System Design Emission Limit (lbs/year)	40000
Maximum Allowable Loss Per Coil (lbs/day)	1.142
Reclaimed Material (lbs/yr)	59095
Annual Savings Lube(\$)	\$ 62,640.22
Cost of System(\$)	\$ 120,000.00
Amortized Cost of System (\$) Over 10 Years	\$ 12,000.00
Annual Operating Cost(\$)	\$ 12,000.00
Annual Savings w/ Costs	\$ 38,640.22
Payback Period(yrs)	3.1

*Maximum Allowable Loss Per Coil* = System Design Emission Limit (lbs) / ( 365 day/year x Coils Per Day )

*Reclaimed Material* = (Loss per coil (lbs) - Maximum allowable los per coil (lbs/year)) x Coils Per Day x 24 hours/day x 365 days/year/ 22 hours blow per day

*Annual Savings w/ Costs (\$)* = *Annual Savings Lube (\$)* - *Amortized Cost of System (\$)* Over 10 Years - *Annual Operating Cost*



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

August 1, 2013

Mr. Tom Muehl  
Circle-Proscio, Inc.  
401 North Gates Dr  
Bloomington, IN 47404

Re: Public Notice  
Circle-Proscio, Inc.  
Permit Level: New Construction MSOP  
Permit Number: 105 - 32470 - 00049

Dear Mr. Muehl:

Enclosed is a copy of your draft New Construction MSOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Monroe Co Public Library, 303 E Kirkwood Ave in Bloomington IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the The Herald Times in Bloomington, IN publish this notice no later than August 7, 2013.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Kristen Willoughby, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-3031 or dial (317) 233-3031.

Sincerely,  
*Len Pogost*

Len Pogost  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter. dot 3/27/08



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Governor

**Thomas W. Easterly**  
Commissioner

## ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 1, 2013

The Herald Times  
Attn: Classifieds  
1900 South Walnut  
Bloomington, Indiana 47402

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Circle-Prosco, Inc., Monroe County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 7, 2013.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

*Len Pogost*

Len Pogost  
Permit Branch  
Office of Air Quality

Permit Level: New Construction MSOP  
Permit Number: 105 - 32470 - 00049

Enclosure  
PN Newspaper.dot 6/13/2013



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

August 1, 2013

To: Monroe Co Public Library 303 E Kirkwood Ave Bloomington IN

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: Circle-Prosc0, Inc.**  
**Permit Number: 105 - 32470 - 00049**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library.dot 6/13/2013



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

### Notice of Public Comment

**August 1, 2013**  
**Circle-Prosc0, Inc.**  
**105 - 32470 - 00049**

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.


Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover.dot 6/13/13

# Mail Code 61-53

IDEM Staff	LPOGOST 8/1/2013 Circle-Prosc0. Inc 105 - 32470 - 00049 draft/		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Tom Muehl Circle-Prosc0, Inc 401 North Gates Dr Bloomington IN 47404 (Source CAATS)									
2		Monroe Co Public Library 303 E Kirkwood Ave Bloomington IN 47408 (Library)									
3		Monroe County Health Department 119 W 7th St Bloomington IN 47404-3989 (Health Department)									
4		Bloomington City Council and Mayors Office 401 N. Morton St. Bloomington IN 47402 (Local Official)									
5		Mr. Richard Monday 545 E. Margaret Dr. Terre Haute IN 47801 (Affected Party)									
6		Monroe County Commissioners Monroe County Courthouse, Room 322 Bloomington IN 47404 (Local Official)									
7		Edward J. Stehno III American Environmental Corporation 8500 Georgetown Road Indianapolis IN 46268 (Consultant)									
8											
9											
10											
11											
12											
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