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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: July 25, 2013

RE: Superior Metal Technologies / 097 - 32751 - 00127

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 6/13/13

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Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Superior Metal Technologies
9850 East 30th Street
Indianapolis, Indiana 46229

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F097-32751-00127	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 25, 2013 Expiration Date: July 25, 2023

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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary fabrication, anodizing, and surface coating of architectural metal products plant.

Source Address:	9850 East 30th Street, Indianapolis, Indiana 46229
General Source Phone Number:	(317) 538-1685
SIC Code:	3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)
County Location:	Marion
Source Location Status:	Nonattainment for $PM_{2.5}$ standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

One (1) Coating Line, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

These four booths use dry filters for particulate matter overspray control, are contained within a total enclosure paint tunnel maintained under negative pressure, and use a natural gas fired catalytic thermal oxidizer for VOC control, identified as Cat-OX #1, with a maximum heat input of 0.4 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Under 40 CFR 63, Subpart HHHHHH (6H), the coating line is considered part of an affected source.

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

This stationary source also includes the following insignificant activities:

(a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

(2) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input capacity of 6.3 million Btu per hour;

(3) Three (3) natural gas fired space heaters, identified as H1 through H3, each with a maximum heat input capacity of 0.1 million Btu per hour;

(4) Four (4) natural gas fired HVAC units, identified as HVAC-1 through HVAC-4, each with a maximum heat input capacity of 0.048 million Btu per hour;

(5) One (1) natural gas fired air make up unit, identified as AM-1, with a maximum heat input capacity of 5.0 million Btu per hour;

(6) One (1) natural gas fired air make up unit, identified as AM-2, with a maximum heat input capacity of 3.0 million Btu per hour;

(7) One (1) natural gas fired process tank heater, identified as S-10, with a maximum heat input capacity of 1.0 million Btu per hour;

(8) One (1) natural gas fired dry off oven, identified as OV-2, with a maximum heat input capacity of 1.0 million Btu per hour; and

(9) One (1) natural gas fired steam boiler with a maximum heat input capacity of 0.382 million Btu per hour.

(b) One (1) powder coating booth with a maximum throughput of 35.6 pounds of powder coating per hour, using dry filters and a dust collector for particulate control, and exhausting indoors;

(c) Three (3) metal inert gas (MIG) welding stations with two (2) stations each with a maximum usage rate of one (1) pound of carbon steel electrode per hour and one (1) station with a maximum usage rate of three (3) pound of carbon steel electrode per hour, using no control, and exhausting indoors;

(d) Aluminum sawing operation cutting aluminum with a maximum size of 96 cubic inches per linear feet, using no control, exhausting indoors, and consisting of the following:

(1) Vertical band saw with a maximum line speed of 61.5 linear feet per second.

(2) Horizontal band saw with a maximum line speed of 24.0 linear feet per second

(e) One (1) anodizing operation, using no control, exhausting indoors, and consisting of the following consisting of the following:

(1) One (1) etch tank with a surface area of 144 square feet and a maximum throughput of 4.86 pounds of etch powder per hour, containing no VOC or HAPs;

(2) One (1) color tank with a surface area of 144 square feet and a maximum throughput of 1.08 gallons of color solution per hour, containing no VOC or HAPs;

(3) One (1) sealant tank with a surface area of 144 square feet and a maximum throughput of 0.8 gallons of sealant per hour, containing no VOC or HAPs;

(4) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 4.41 pounds of cleaner powder per hour, containing VOC but no HAPs;

(5) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 3.41 pounds of cleaner powder per hour, containing no VOC or HAPs;

(6) One (1) deoxidizing tank with a surface area of 144 square feet and a maximum throughput of 3.41 gallons of deoxidizing solution per hour, containing no VOC or HAPs; and

(7) Six (6) to twelve (12) water rinsing tanks.

(f) One (1) paint pre-treat cleaning operation consisting of alkaline cleaner, chrome phosphate cleaner, hydrofluoric acid cleaner, and water rinse tanks and an associated dry off oven for cleaning miscellaneous metal parts in preparation for surface coating application(s), with a maximum usage of 0.14 pounds of cleaner per hour, using no control, and exhausting indoors;

(g) One (1) polyurethane thermal fill operation with a maximum usage of 440.0 gallons of each component per year, using no control, and exhausting indoors;

(h) Paved roads and parking lots with public access;

(i) Storage tanks with capacity less than or equal to 1000 gallons and annual throughputs less than 12,000 gallons. Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;

(j) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(k) Closed loop heating and cooling systems;

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%;

(m) Heat exchanger cleaning and repair;

(n) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process; and

(o) Blowdown for any of the following: sight glass, boiler, compressor, pump or cooling tower.

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

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

(a) This permit, F097-32751-00127, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F097-32751-00127 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.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(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. Support information includes the following:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) Coating Line, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

These four booths use dry filters for particulate matter overspray control, are contained within a total enclosure paint tunnel maintained under negative pressure, and use a natural gas fired catalytic thermal oxidizer for VOC control, identified as Cat-OX #1, with a maximum heat input of 0.4 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Under 40 CFR 63, Subpart HHHHHH (6H), the coating line is considered part of an affected source.

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

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

D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 and to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(a) The total input of VOC at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), including VOC cleaners and solvents, shall not exceed 354.20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The total input of any single HAP at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), shall not exceed 35.03 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The total input of the combined HAPs at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), shall not exceed 86.58 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(d) The catalytic thermal oxidizer (Cat-Ox #1) shall control the VOC and HAPs emissions from the Coating Line and the overall control efficiency of the catalytic thermal oxidizer (Cat-Ox #1) shall be greater than or equal to 74.6%.

(e) The paint tunnel as a total enclosure with negative pressure shall be in operation at all times when the Coating Line is in operation.

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

consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

(a) Pursuant to 326 IAC 8-2-9(c)(2), the Permittee shall not discharge into the atmosphere VOC from the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator

(b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions from the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D)$$

Where:

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating
D = Density of VOC in coating in pounds per gallon of VOC;

A solvent density of 7.36 pounds of VOC per gallon of solvent in the coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2(a).

The pounds of VOC per gallon of coating solids shall be limited to less than or equal to 6.67 pounds of VOC per gallon coating solids as applied.

(c) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the catalytic thermal oxidizer (Cat-Ox #1) shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coatings as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall control efficiency of the catalytic thermal oxidizer (Cat-Ox #1) shall be greater than or equal to 74.6%.

D.1.3 Volatile Organic Compounds (VOC), Clean-up Requirements [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings,

thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

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

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

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

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

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

D.1.4 Particulate [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and to comply with Conditions D.1.1 and D.1.2, the Permittee shall operate the paint tunnel total enclosure and catalytic thermal oxidizer (Cat-Ox #1) at all times the coating line is in operation.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC input usage and content contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform inlet and outlet VOC, single HAPs, and combined HAPs testing of the catalytic thermal oxidizer (Cat-Ox #1), utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

D.1.9 Paint Tunnel Total Enclosure

Pursuant to FESOP No. F097-7881-00127, issued on January 22, 1998, determination of a total enclosure, as defined by 40 CFR Part 51 Method 204, shall be made by each of the following methods:

(a) Any natural draft opening must be at least four (4) equivalent diameters from spray booths B-1, B-2, B-5, and B-6;

(b) The total area of all natural draft openings shall not exceed five (5) percent of the surface area of the enclosures four walls, floor and ceiling;

(c) The direction of flow through all natural draft openings shall be into the paint tunnel. The average facial velocity of air through all natural draft openings shall be at least two hundred (200) feet per minute;

(d) All paint tunnel access doors and windows shall be closed during operation.

D.1.10 Particulate Control

In order to comply with Condition D.1.4, the dry filters for particulate control shall be in operation at all times when the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) is in operation.

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

D.1.11 Catalytic Thermal Oxidizer (Cat-Ox #1) Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic thermal oxidizer (Cat-Ox #1) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average and shall not be less than 650°F, or the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the limits in Conditions D.1.1 and D.1.2.

(b) When for any one reading, the 3-hour average temperature of the catalytic thermal oxidizer (Cat-Ox #1) is below the 3-hour average temperature as stated in (a), the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour average temperature that is below this value is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.12 Catalytic Thermal Oxidizer (Cat-Ox #1) Induced Fan Amperage

(a) The fan amperage on the concentrator fan at the catalytic thermal oxidizer (Cat-Ox #1) shall be observed at least once per day when the Paint Tunnel surface coating is in operation. When for any one reading, the fan amperage is outside the normal range of 37 to 54 amps, or the range established in most recent compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside this range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) The fan amperage on the catalytic thermal oxidizer (Cat-Ox #1) fan shall be observed at least once per day when the Paint Tunnel surface coating is in operation. When for any one reading, the fan amperage is outside the normal range of 14 to 20 amps, or the range established in most recent compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances

contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside this range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.13 Dry Filter Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S-OX while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the sides of the building and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.14 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain the 'Paint Department Operation Log', in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Condition D.1.1, and the VOC emission limit established in Condition D.1.2. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.

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

(2) The amount of coating material and solvent used on a monthly basis.

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

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

(3) The monthly cleanup solvent usage.

(4) The total VOC and HAP (single and combined) usage for each month.

(5) The weight of VOC and HAP (single and combined) emitted for each compliance period.

(b) To document the compliance status with Conditions D.1.11 and D.1.12, the Permittee shall maintain the following:

(1) Continuous temperature records (on a 3-hour average basis) for the catalytic thermal oxidizer (Cat-Ox #1) and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) Records of the fan amperage for the concentrator fan taken once per day. The Permittee shall include in its daily record when a fan amperage reading is not taken and the reason for the lack of fan amperage reading (e.g., the process did not operate that day).

(3) Records of the fan amperage for the catalytic thermal oxidizer (Cat-Ox #1) fan taken once per day. The Permittee shall include in its daily record when a fan amperage reading is not taken and the reason for the lack of fan amperage reading (e.g., the process did not operate that day).

(c) To document compliance with Condition D.1.13, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.

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

D.1.15 Reporting Requirements

The 'Paint Department Operation Log' and a quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The following insignificant activities as defined in 326 IAC 2-7-1(21):

(a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

(2) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input capacity of 6.3 million Btu per hour;

(3) Three (3) natural gas fired space heaters, identified as H1 through H3, each with a maximum heat input capacity of 0.1 million Btu per hour;

(4) Four (4) natural gas fired HVAC units, identified as HVAC-1 through HVAC-4, each with a maximum heat input capacity of 0.048 million Btu per hour;

(5) One (1) natural gas fired air make up unit, identified as AM-1, with a maximum heat input capacity of 5.0 million Btu per hour;

(6) One (1) natural gas fired air make up unit, identified as AM-2, with a maximum heat input capacity of 3.0 million Btu per hour;

(7) One (1) natural gas fired process tank heater, identified as S-10, with a maximum heat input capacity of 1.0 million Btu per hour;

(8) One (1) natural gas fired dry off oven, identified as OV-2, with a maximum heat input capacity of 1.0 million Btu per hour; and

(9) One (1) natural gas fired steam boiler with a maximum heat input capacity of 0.382 million Btu per hour.

(b) One (1) powder coating booth with a maximum throughput of 35.6 pounds of powder coating per hour, using dry filters and a dust collector for particulate control, and exhausting indoors;

(c) Three (3) metal inert gas (MIG) welding stations with two (2) stations each with a maximum usage rate of one (1) pound of carbon steel electrode per hour and one (1) station with a maximum usage rate of three (3) pound of carbon steel electrode per hour, using no control, and exhausting indoors;

(d) Aluminum sawing operation cutting aluminum with a maximum size of 96 cubic inches per linear feet, using no control, exhausting indoors, and consisting of the following:

(1) Vertical band saw with a maximum line speed of 61.5 linear feet per second.

(2) Horizontal band saw with a maximum line speed of 24.0 linear feet per second

(e) One (1) anodizing operation, using no control, exhausting indoors, and consisting of the following consisting of the following:

(1) One (1) etch tank with a surface area of 144 square feet and a maximum throughput of

4.86 pounds of etch powder per hour, containing no VOC or HAPs;

(2) One (1) color tank with a surface area of 144 square feet and a maximum throughput of 1.08 gallons of color solution per hour, containing no VOC or HAPs;

(3) One (1) sealant tank with a surface area of 144 square feet and a maximum throughput of 0.8 gallons of sealant per hour, containing no VOC or HAPs;

(4) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 4.41 pounds of cleaner powder per hour, containing VOC but no HAPs;

(5) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 3.41 pounds of cleaner powder per hour, containing no VOC or HAPs;

(6) One (1) deoxidizing tank with a surface area of 144 square feet and a maximum throughput of 3.41 gallons of deoxidizing solution per hour, containing no VOC or HAPs; and

(7) Six (6) to twelve (12) water rinsing tanks.

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

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

D.2.1 Particulate [326 IAC 6.5-1-2]

(1) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from the two (2) natural gas fired boilers shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

(2) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from all other natural gas combustion units shall not exceed three-hundredth (0.03) grain per dry standard cubic foot (dscf).

(3) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant powder coating booth shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(4) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the three (3) insignificant welding stations shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(5) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant aluminum sawing operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(6) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant anodizing operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) Coating Line, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

These four booths use dry filters for particulate matter overspray control, are contained within a total enclosure paint tunnel maintained under negative pressure, and use a natural gas fired catalytic thermal oxidizer for VOC control, identified as Cat-OX #1, with a maximum heat input of 0.4 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Under 40 CFR 63, Subpart HHHHHH (6H), the coating line is considered part of an affected source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

E.1.1 General Provisions Relating to NESHAP [40 CFR Part 63, Subpart A] [326 IAC 20-1]

Pursuant to 40 CFR 63, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR 63, Subpart HHHHHH (6H).

E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH (6H)]

The Permittee, which engages in miscellaneous surface coating, shall comply with the following provisions of 40 CFR 63, Subpart HHHHHH (6H) (included as Attachment A of this permit):

(a) 40 CFR 63.11169(c)
(b) 40 CFR 63.11170(a)(3) and (b)
(c) 40 CFR 63.11171(a), (b), and (e)
(d) 40 CFR 63.11172(b)
(e) 40 CFR 63.11173(e), (f), (g)(2), and (g)(3)
(f) 40 CFR 63.11174
(g) 40 CFR 63.11175(a),(b)
(h) 40 CFR 63.11176(a)
(i) 40 CFR 63.11177(a), (b), (c), (d), (g), and (h)
(j) 40 CFR 63.11178
(k) 40 CFR 63.11179
(l) 40 CFR 63.11180
(m) Table 1 to Subpart HHHHHH (6H) of Part 63

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP Permit No.: F097-32751-00127

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP Permit No.: F097-32751-00127

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

FESOP Quarterly Report

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP Permit No.: F097-32751-00127
Facility: Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)
Parameter: VOC, single and combined HAPs usages
Limit:
(a) The total input VOC usage at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), including VOC cleaners and solvents, shall not exceed 354.20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
(b) The total input of any single HAP at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), shall not exceed 35.03 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
(c) The total input of the combined HAPs at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), shall not exceed 86.58 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

Month	Total Usage This Month (tons)			Total Usage Previous 11 Months (tons)			Total 12-Month Usage (tons)		
	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

*List the single HAP with the greatest emission rate

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP Permit No.: F097-32751-00127

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Attachment A

Title 40: Protection of Environment

Part 63 - National Emission Standards for Hazardous Air Pollutants (NESHAP)

Subpart HHHHHH (6H) — National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

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

What This Subpart Covers

§ 63.11169 What is the purpose of this subpart?

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

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

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

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

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

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

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

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

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

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

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

§ 63.11170 Am I subject to this subpart?

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

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

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

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

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

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

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

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

(1) Mixing rooms and equipment;

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

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

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

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

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

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

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

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

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

General Compliance Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

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

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

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

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

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

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

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

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

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

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002” (incorporated by reference, see §63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Notifications, Reports, and Records

§ 63.11175 What notifications must I submit?

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

(1) The company name, if applicable.

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

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

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

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

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

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

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

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

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's

name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

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

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

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

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

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

§ 63.11176 What reports must I submit?

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

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

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

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

requirements for paint stripping operations that annually use more than one ton of MeCl in §§63.11173(d) and 63.11177(f).

§ 63.11177 What records must I keep?

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

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

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

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

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

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

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

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

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

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

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

Other Requirements and Information

§ 63.11179 Who implements and enforces this subpart?

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

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

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

§ 63.11180 What definitions do I need to know?

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

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

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

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

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

Appurtenance means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

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

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

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

(1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.

(2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.

(3) Adhesives, sealants, maskants, or caulking materials.

(4) Temporary protective coatings, lubricants, or surface preparation materials.

(5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Non-HAP solvent means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

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

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

Painter means any person who spray applies coating.

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

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

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

(1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.

(3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.

(4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

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

(1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.

(2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.

(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

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

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

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

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

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

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

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

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

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

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

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

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

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.1(a)(1)–(12)	General Applicability	Yes	
§63.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in §63.11170.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.1(c)(5)	Notifications	Yes	
§63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.2	Definitions	Yes	Additional definitions are specified in §63.11180.
§63.3(a)–(c)	Units and Abbreviations	Yes	
§63.4(a)(1)–(5)	Prohibited Activities	Yes	
§63.4(b)–(c)	Circumvention/Fragmentation	Yes	
§63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§63.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(e)(1)–(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.

§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§63.6(f)(2)–(3)	Methods for Determining Compliance	Yes	
§63.6(g)(1)–(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§63.6(i)(1)–(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(a)–(d)	Notification Requirements	Yes	§63.11175 specifies notification requirements.
§63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(h)	Notification of Compliance Status	No	§63.11175 specifies the dates and required content for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	§63.11176(a) specifies the dates for submitting the notification of changes report.
§63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §63.11177.
§63.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.

§63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.11176.
§63.10(d)(2)–(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14.
§63.15	Availability of Information/Confidentiality	Yes	
§63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§63.16(b)–(c)	Performance Track Provisions—reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	**Superior Metal Technologies**
Source Location:	**9850 East 30th Street, Indianapolis, Indiana 46229**
County:	**Marion**
SIC Code:	**3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)**
Permit Renewal No.:	**F097-32751-00127**
Permit Reviewer:	**Ryan Graunke**

On May 20, 2013, the Office of Air Quality (OAQ) had a notice published in Indianapolis Star, Indianapolis, Indiana, stating that Superior Metal Technologies had applied for a FESOP Renewal. The notice also stated that the OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On June 19, 2013, Superior Metal Technology submitted comments to IDEM, OAQ on the draft FESOP Renewal.

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

Comment 1:

The source submitted an updated list and emission calculations for insignificant activities at the source.

Response to Comment 1:

Potential emissions from these insignificant activities have been incorporated in the source-wide potential to emit. These descriptions have also been incorporated into Section A.3 of the permit. Including these emission units into the permit did not require a change to any emission limits or permit conditions that were included in the draft permit that went on public notice.

The following the insignificant activities have been incorporated into the permit:

(a) One (1) powder coating booth with a maximum throughput of 35.6 pounds of powder coating per hour, using dry filters and a dust collector for particulate control, and exhausting indoors.

(b) Three (3) Metal Inert Gas (MIG) welding stations with two (2) stations each with a maximum usage rate of one (1) pound of carbon steel electrode per hour and one (1) station with a maximum usage rate of three (3) pound of carbon steel electrode per hour, using no control, and exhausting indoors.

(c) Aluminum sawing operation cutting aluminum with a maximum size of 96 cubic inches per linear feet, using no control, exhausting indoors, and consisting of the following:

(1) Vertical band saw with a maximum line speed of 61.5 linear feet per second.

(2) Horizontal band saw with a maximum line speed of 24.0 linear feet per second

(d) One (1) anodizing operation, using no control, exhausting indoors, and consisting of the following consisting of the following:

(1) One (1) etch tank with a surface area of 144 square feet and a maximum throughput of 4.86 pounds of etch powder per hour, containing no VOC or HAPs.

(2) One (1) color tank with a surface area of 144 square feet and a maximum throughput of 1.08 gallons of color solution per hour, containing no VOC or HAPs.

(3) One (1) sealant tank with a surface area of 144 square feet and a maximum throughput of 0.8 gallons of sealant per hour, containing no VOC or HAPs.

(4) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 4.41 pounds of cleaner powder per hour, containing VOC but no HAPs.

(5) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 3.41 pounds of cleaner powder per hour, containing no VOC or HAPs.

(6) One (1) deoxidizing tank with a surface area of 144 square feet and a maximum throughput of 3.41 gallons of deoxidizing solution per hour, containing no VOC or HAPs.

(7) Six (6) to twelve (12) water rinsing tanks.

(e) One (1) paint pre-treat cleaning operation consisting of alkaline cleaner, chrome phosphate cleaner, hydrofluoric acid cleaner, and water rinse tanks and an associated dry off oven for cleaning miscellaneous metal parts in preparation for surface coating application(s), with a maximum usage of 0.14 pounds of cleaner per hour, using no control, and exhausting indoors;

(f) One (1) two-component thermal fill operation with a maximum usage of 440.0 gallons of each component per year, using no control, and exhausting indoors;

In addition, twelve of the natural gas fired space heaters (identified as H4-H15) and the internal combustion engine are no longer at the source.

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	83.03
PM_{10}	83.30
$PM_{2.5}$	83.26
SO_2	0.05
NO_x	8.92
VOC	468.12
CO	7.49
GHGs as CO_2e	10,770
Total HAP	356.50
Single HAP	76.75 - Glycol Ethers

HAPs	Tons/year
Xylene	74.4
Toluene	63.6
Methyl isobutyl ketone	45.8
Ethyl Benzene	17.5
Dimethyl phthalate	72.7
Glycol ethers	76.7
Chromium compounds	4.2
Hexane	0.16
Manganese	0.01
Hydrofluoric acid	0.18
4,4'-Diphenylmethane Diisocyanate	1.02
Total	**356.50**

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Coating Line (B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	90.00	-	-	22.00	8.90 (Glycol ethers)
Natural Gas Combustion	0.17	0.68	0.68	0.05	8.92	0.49	7.49	10,770	0.17	0.19 (Hexane)
~~Insignificant Activities ***~~	~~5.00~~	~~5.00~~	~~5.00~~			~~5.00~~			~~2.5~~	~~1.00 (Glycol ethers)~~
Powder Coating	**1.48**	**1.48**	**1.48**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Welding stations	**0.12**	**0.12**	**0.12**	**-**	**-**	**-**	**-**	**-**	**0.01**	**0.01 (Mn)**
Aluminum Sawing	**0.01**	**0.01**	**0.01**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Anodizing Tanks	**2.27**	**2.27**	**2.27**	**-**	**-**	**1.93**	**-**	**-**	**-**	**-**
Paint Pre-treat Cleaners	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**0.18**	**0.18 (HF)**
Thermal Fill	**-**	**-**	**-**	**-**	**-**	**2.77**	**-**	**-**	**1.02**	**1.02 (MDI)**
Paved Roads	**0.30**	**0.06**	**0.01**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
~~**Total PTE of Entire Source**~~	~~**83.80**~~	~~**84.39**~~	~~**84.39**~~	~~**0.06**~~	~~**10.3**~~	~~**95.57**~~	~~**8.65**~~	~~**12,429**~~	~~**24.69**~~	~~**9.90 (Glycol ethers)**~~
Total PTE of Entire Source	**83.03**	**83.30**	**83.26**	**0.05**	**8.92**	**95.19**	**7.49**	**10,770**	**23.38**	**8.90 (Glycol Ethers)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	100,000 CO_2e	NA	NA
Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
~~***PTE of insignificant activities is assuming the emissions thresholds for insignificant units.~~

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Coating Line (B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	90.00	-	-	22.00	8.90 (Glycol ethers)
Natural Gas Combustion	0.17	0.68	0.68	0.05	8.92	0.49	7.49	10,770	0.17	0.19 (Hexane)
Powder Coating	1.48	1.48	1.48	-	-	-	-	-	-	-
Welding stations	0.12	0.12	0.12	-	-	-	-	-	0.01	0.01 (Mn)
Aluminum Sawing	0.01	0.01	0.01	-	-	-	-	-	-	-
Anodizing Tanks	2.27	2.27	2.27	-	-	1.93	-	-	-	-
Paint Pre-treat Cleaners	-	-	-	-	-	-	-	-	0.18	0.18 (HF)
Thermal Fill	-	-	-	-	-	2.77	-	-	1.02	1.02 (MDI)
Paved Roads	0.30	0.06	0.01	-	-	-	-	-	-	-
Total PTE of Entire Source	**83.03**	**83.30**	**83.26**	**0.05**	**8.92**	**95.19**	**7.49**	**10,770**	**23.38**	**8.90 (Glycol Ethers)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	100,000 CO_2e	NA	NA
Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.

The following federal rules have been evaluated for these insignificant activities:

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production and Fabrication Area Sources (40 CFR Par 63 Subpart OOOOOO (6O)) are not included in the permit for the thermal fill operation because the process is not considered flexible polyurethane foam production, as defined in 40 CFR 63.1292, or flexible polyurethane foam fabrication facility, as defined in 40 CFR 63.11419.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR Par 63 Subpart XXXXXX (6X)) are not included in the permit for the welding stations because the metal HAPs content of the welding rod, based on the default emission factor of carbon steel, is

below the thresholds to be considered a material that contains metal fabrication and finishing metal HAPs, pursuant to 40 CFR 63.11514(b).

The following state rules have been evaluated for these insignificant activities:

Powder Coating Booth

(a) 326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the powder coating booth shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The powder coating booth is exempt from 326 IAC 6-3-2 because it has potential PM emissions less than five hundred fifty-one thousandths (0.551) pounds per hour.

(c) 326 IAC 8-2-9 (Surface Coating VOC Emission Limitations: Miscellaneous Metal and Plastic Parts)
Pursuant to 326 IAC 8-2-1, the provisions of 326 IAC 8-2-9 apply to miscellaneous metal coating operations existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter, or St. Joseph counties, and which have actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls. The powder coating booth is not subject to 326 IAC 8-1-6 because it does not have potential to emit VOC.

Welding Stations

(d) 326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the three (3) welding stations shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(e) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The three (3) welding stations are exempt from 326 IAC 6-3-2 because they have potential PM emissions less than five hundred fifty-one thousandths (0.551) pounds per hour.

Aluminum Sawing

(f) 326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the aluminum sawing operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The aluminum sawing operation is exempt from 326 IAC 6-3-2 because it has potential PM emissions less than five hundred fifty-one thousandths (0.551) pounds per hour.

Anodizing tanks

(h) 326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the anodizing operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The anodizing operation is exempt from 326 IAC 6-3-2 because it has potential PM emissions less than five hundred fifty-one thousandths (0.551) pounds per hour.

(j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The anodizing operation is not subject to 326 IAC 8-1-6 because it has potential VOC emissions less than twenty-five (25) tons per year.

Paint pre-treat cleaning operation

(k) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The paint pre-treat cleaning operation is not subject to 326 IAC 8-1-6 because it has potential VOC emissions less than twenty-five (25) tons per year.

Thermal fill operation

(l) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The thermal fill operation is not subject to 326 IAC 8-1-6 because it has potential VOC emissions less than twenty-five (25) tons per year.

The permit has been revised as follows:

. . .

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

This stationary source also includes the following insignificant activities:

(a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

(2) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input capacity of 6.3 million Btu per hour;

(3) ~~Fifteen (15)~~ **Three (3)** natural gas fired space heaters, identified as H1 through H3, each with a maximum heat input capacity of 0.1 million Btu per hour;

(4) Four (4) natural gas fired HVAC units, identified as HVAC-1 through HVAC-4, each with a maximum heat input capacity of 0.048 million Btu per hour;

(5) One (1) natural gas fired air make up unit, identified as AM-1, with a maximum heat input capacity of 5.0 million Btu per hour;

(6) One (1) natural gas fired air make up unit, identified as AM-2, with a maximum heat input capacity of 3.0 million Btu per hour;

(7) One (1) natural gas fired process tank heater, identified as S-10, with a maximum heat input capacity of 1.0 million Btu per hour;

(8) One (1) natural gas fired dry off oven, identified as OV-2, with a maximum heat input capacity of 1.0 million Btu per hour; and

(9) One (1) natural gas fired steam boiler with a maximum heat input capacity of 0.382 million Btu per hour.

~~(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr;~~

(b) One (1) powder coating booth with a maximum throughput of 35.6 pounds of powder coating per hour, using dry filters and a dust collector for particulate control, and exhausting indoors;

(c) Three (3) metal inert gas (MIG) welding stations with two (2) stations each with a maximum usage rate of one (1) pound of carbon steel electrode per hour and one (1) station with a maximum usage rate of three (3) pound of carbon steel electrode per hour, using no control, and exhausting indoors;

(d) Aluminum sawing operation cutting aluminum with a maximum size of 96 cubic inches per linear feet, using no control, exhausting indoors, and consisting of the following:

(1) Vertical band saw with a maximum line speed of 61.5 linear feet per second.

(2) Horizontal band saw with a maximum line speed of 24.0 linear feet per second

(e) One (1) anodizing operation, using no control, exhausting indoors, and consisting of the following consisting of the following:

(1) One (1) etch tank with a surface area of 144 square feet and a maximum throughput of 4.86 pounds of etch powder per hour, containing no VOC or HAPs;

(2) One (1) color tank with a surface area of 144 square feet and a maximum throughput of 1.08 gallons of color solution per hour, containing no VOC or HAPs;

(3) One (1) sealant tank with a surface area of 144 square feet and a maximum throughput of 0.8 gallons of sealant per hour, containing no VOC or HAPs;

(4) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 4.41 pounds of cleaner powder per hour, containing VOC but no HAPs;

(5) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 3.41 pounds of cleaner powder per hour, containing no VOC or HAPs;

(6) One (1) deoxidizing tank with a surface area of 144 square feet and a maximum throughput of 3.41 gallons of deoxidizing solution per hour, containing no VOC or HAPs; and

(7) Six (6) to twelve (12) water rinsing tanks.

(f) One (1) paint pre-treat cleaning operation consisting of alkaline cleaner, chrome phosphate cleaner, hydrofluoric acid cleaner, and rinse tanks and an associated dry off oven for cleaning miscellaneous metal parts in preparation for surface coating application(s), with a maximum usage of 0.14 pounds of cleaner per hour, using no control, and exhausting indoors;

(g) One (1) polyurethane thermal fill operation with a maximum usage of 440.0 gallons of each component per year, using no control, and exhausting indoors;

(~~c~~**h**) Paved roads and parking lots with public access;

~~(d) Anodizing system consisting of between 26 and 36 tanks. Each tank contains one of the following solutions; soap, caustic, anodize, color, sealer, water or deionized water rinse;~~

~~(e) Alkaline cleaner, chrome phosphate, citrus acid and rinse tanks and an associated dry off oven for miscellaneous metal parts cleaning in preparation for surface coating application(s);~~

(~~f~~**i**) Storage tanks with capacity less than or equal to 1000 gallons and annual throughputs less than 12,000 gallons. Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;

(~~g~~**j**) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

~~(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment;~~

(~~i~~**k**) Closed loop heating and cooling systems;

(~~j~~**l**) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%;

(~~k~~**m**) Heat exchanger cleaning and repair;

(~~l~~**n**) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process; and

(~~m~~**o**) Blowdown for any of the following: sight glass, boiler, compressor, pump or cooling tower.

. . .

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The following insignificant activities as defined in 326 IAC 2-7-1(21):

(a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

(2) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input capacity of 6.3 million Btu per hour;

(3) ~~Fifteen (15)~~ **Three (3)** natural gas fired space heaters, identified as H1 through H3, each with a maximum heat input capacity of 0.1 million Btu per hour;

(4) Four (4) natural gas fired HVAC units, identified as HVAC-1 through HVAC-4, each with a maximum heat input capacity of 0.048 million Btu per hour;

(5) One (1) natural gas fired air make up unit, identified as AM-1, with a maximum heat input capacity of 5.0 million Btu per hour;

(6) One (1) natural gas fired air make up unit, identified as AM-2, with a maximum heat input capacity of 3.0 million Btu per hour;

(7) One (1) natural gas fired process tank heater, identified as S-10, with a maximum heat

input capacity of 1.0 million Btu per hour;

(8) One (1) natural gas fired dry off oven, identified as OV-2, with a maximum heat input capacity of 1.0 million Btu per hour; and

(9) One (1) natural gas fired steam boiler with a maximum heat input capacity of 0.382 million Btu per hour.

~~(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr;~~

(b) One (1) powder coating booth with a maximum throughput of 35.6 pounds of powder coating per hour, using dry filters and a dust collector for particulate control, and exhausting indoors;

(c) Three (3) metal inert gas (MIG) welding stations with two (2) stations each with a maximum usage rate of one (1) pound of carbon steel electrode per hour and one (1) station with a maximum usage rate of three (3) pound of carbon steel electrode per hour, using no control, and exhausting indoors;

(d) Aluminum sawing operation cutting aluminum with a maximum size of 96 cubic inches per linear feet, using no control, exhausting indoors, and consisting of the following:

(1) Vertical band saw with a maximum line speed of 61.5 linear feet per second.

(2) Horizontal band saw with a maximum line speed of 24.0 linear feet per second

(e) One (1) anodizing operation, using no control, exhausting indoors, and consisting of the following consisting of the following:

(1) One (1) etch tank with a surface area of 144 square feet and a maximum throughput of 4.86 pounds of etch powder per hour, containing no VOC or HAPs;

(2) One (1) color tank with a surface area of 144 square feet and a maximum throughput of 1.08 gallons of color solution per hour, containing no VOC or HAPs;

(3) One (1) sealant tank with a surface area of 144 square feet and a maximum throughput of 0.8 gallons of sealant per hour, containing no VOC or HAPs;

(4) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 4.41 pounds of cleaner powder per hour, containing VOC but no HAPs;

(5) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 3.41 pounds of cleaner powder per hour, containing no VOC or HAPs;

(6) One (1) deoxidizing tank with a surface area of 144 square feet and a maximum throughput of 3.41 gallons of deoxidizing solution per hour, containing no VOC or HAPs; and

(7) Six (6) to twelve (12) water rinsing tanks.

~~(d) Anodizing system consisting of between 26 and 36 tanks. Each tank contains one of the following solutions; soap, caustic, anodize, color, sealer, water or deionized water rinse;~~

~~(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment;~~

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

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

D.2.1 Particulate [326 IAC 6.5-1-2]

(1) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from the two (2) natural gas fired boilers shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

(2) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from all other natural gas combustion units shall not exceed three-hundredth (0.03) grain per dry standard cubic foot (dscf).

(3) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant ~~anodizing tanks~~ **powder coating booth** shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf). ~~This is a new requirement to the source.~~

(4) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the **three (3)** insignificant welding ~~operation~~ **stations** shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(5) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant aluminum sawing operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(6) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant anodizing operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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IDEM Contact

(a) Questions regarding this proposed FESOP Renewal can be directed to Ryan Graunke at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

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

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

Appendix A: Emissions Calculations
Summary of Emissions

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Unlimited Potential to Emit (tons/yr)

Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Combined HAPs	Single HAP	
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	462.9	-	-	355.1	76.75	Glycol Ethers
Natural Gas Combustion	0.17	0.68	0.68	0.05	8.9	0.49	7.49	10,770	0.17	0.16	Hexane
Powder Coating	1.56	1.56	1.56	-	-	-	-	-	-	-	-
Welding	0.12	0.12	0.12	-	-	-	-	-	0.01	0.01	Mn
Aluminum Sawing	0.01	0.01	0.01	-	-	-	-	-	-	-	-
Anodizing Tanks	2.27	2.27	2.27	-	-	1.93	-	-	-	-	-
Paint Pre-treat Cleaners	-	-	-	-	-	-	-	-	0.18	0.18	HF
Thermal Fill	-	-	-	-	-	2.77	-	-	1.02	1.02	MDI
Paved Roads	0.30	0.06	0.01	-	-	-	-	-	-	-	-
Total	**83.03**	**83.30**	**83.26**	**0.05**	**8.92**	**468.12**	**7.49**	**10,770**	**356.50**	**76.75**	**Glycol Ethers**

Limited Potential to Emit (tons/yr)

Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Combined HAPs	Single HAP	
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	90.00	-	-	22.00	8.90	Glycol Ethers
Natural Gas Combustion	0.17	0.68	0.68	0.05	8.92	0.49	7.49	10,770	0.17	0.16	Hexane
Powder Coating	1.56	1.56	1.56	-	-	-	-	-	-	-	-
Welding	0.12	0.12	0.12	-	-	-	-	-	0.01	0.01	Mn
Aluminum Sawing	0.01	0.01	0.01	-	-	-	-	-	-	-	-
Anodizing Tanks	2.27	2.27	2.27	-	-	1.93	-	-	-	-	-
Paint Pre-treat Cleaners	-	-	-	-	-	-	-	-	0.18	0.18	HF
Thermal Fill	-	-	-	-	-	2.77	-	-	1.02	1.02	MDI
Paved Roads	0.30	0.06	0.01	-	-	-	-	-	-	-	-
Total	**83.03**	**83.24**	**83.24**	**0.05**	**8.92**	**95.19**	**7.49**	**10,770**	**23.38**	**8.90**	**Glycol Ethers**

Appendix A: Emissions Calculations
Coating Line - VOC and PM (Unlimited)

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hour)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Binks Spray Booth	B-1	KY1C17839 (As supplied)	10.6	45.0%	0.0%	45.0%	0.0%	26.00%										
		As applied	**10.1**	**56.0%**	**0.0%**	**56.0%**	**0.0%**	**26.00%**	**0.0040**	**1500.0**	**5.66**	**5.66**	**21.75**	**33.9**	**814.5**	**148.6**	**29.2**	**75%**
Binks Spray Booth	B-2	KY1C17839 (As supplied)	10.6	45.0%	0.0%	45.0%	0.0%	26.00%										
		As applied	**10.1**	**56.0%**	**0.0%**	**56.0%**	**0.0%**	**26.00%**	**0.0040**	**1500.0**	**5.66**	**5.66**	**21.75**	**33.9**	**814.5**	**148.6**	**29.2**	**75%**
Telkamp Spray Booth	B-5	KW3C19694 (As supplied)	9.7	59.0%	0.0%	59.0%	0.0%	24.00%										
		As applied	**9.4**	**67.2%**	**0.0%**	**67.2%**	**0.0%**	**24.00%**	**0.0020**	**1500.0**	**6.30**	**6.30**	**26.26**	**18.9**	**453.8**	**82.8**	**10.1**	**75%**
Telkamp Spray Booth	B-6	KW3C19694 (As supplied)	9.7	59.0%	0.0%	59.0%	0.0%	24.00%										
		As applied*	**9.4**	**67.2%**	**0.0%**	**67.2%**	**0.0%**	**24.00%**	**0.0020**	**1500.0**	**6.30**	**6.30**	**26.26**	**18.9**	**453.8**	**82.8**	**10.1**	**75%**
		KC3C19704 (As supplied)	9.1	72.0%	0.0%	72.0%	0.0%	39.00%										
		As applied	**9.3**	**77.6%**	**0.0%**	**77.6%**	**0.0%**	**39.00%**	**0.0010**	**1500.0**	**7.22**	**7.22**	**18.50**	**10.8**	**259.8**	**47.4**	**3.4**	**75%**
													Total:	**105.7**	**2536.6**	**462.9**	**78.6**	

Notes
As applied assumes the use of worst case diluent (glycol ether).
* Booth 6 - coatings are mutually exclusive. Worst case scenario (KWC3C19694) used to determine potential to emit.

Methodology:
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

Compliance with 326 IAC 8-2-9

Emission Unit	Emission Unit ID	Material	Equivalent emission limit (lb VOC/gal coating solids)	VOC content (lb/gal coating solids)	Overall control efficiency
Binks Spray Booth	B-1	KY1C17839	6.67	21.75	69.3%
Binks Spray Booth	B-2	KY1C17839	6.67	21.75	69.3%
Telkamp Spray Booth	B-5	KW3C19694	6.67	26.26	74.6%
Telkamp Spray Booth	B-6	KW3C19694	6.67	26.26	74.6%
		KC3C19704	6.67	18.50	63.9%

Note:
The minimum control efficiency of the catalytic thermal oxidizer shall be greater than or equal to 74.6%

Methodology:
Pursuant to 8-1-2(b)(1), the equivalent VOC emissions limit is 4.02 lb VOC/gal of coating solids, as applied, calculated using the equation: E = L/(1-L/D)
Where: E = Equivalent emission limit in lb VOC/gal of coating solids, as applied
L = Emission limit from 326 IAC 8-2-9 (3.5 lb VOC/gal of coating less water)
D = Baseline solvent density of VOC in coating (7.36 lb VOC/gal of solvent)
Pursuant to 8-1-2(c), the overall efficiency of the thermal oxidizer is calculated using the equation: O=(V-E)/V*100
Where: O = Equivalent overall efficiency of the thermal oxidizer as a percentage
V = The weighted average VOC contents of all coatings in lb VOC/gal of coating solids, as applied
E = Equivalent emission limit = (6.67 lb VOC/gal of coating solids, as applied)

Appendix A: Emission Calculations
Coating Line - HAPs (Unlimited)

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum throughput (unit/hour)	Xylene		Toluene		Methyl Isobutyl Ketone		Ethyl Benzene		Dimethyl phthalate		Glycol Ethers		Chromium Compounds	
						Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)
Binks Spray Booth	B-1	KY1C17839	10.1	0.004000	1500.00	11.00%	29.20	8.60%	22.83	3.90%	10.35	2.60%	6.90	9.10%	24.15	11.30%	29.99	0.80%	2.12
Binks Spray Booth	B-2	KY1C17839	10.1	0.004000	1500.00	11.00%	29.20	8.60%	22.83	3.90%	10.35	2.60%	6.90	9.10%	24.15	11.30%	29.99	0.80%	2.12
Telkamp Spray Booth	B-5	KW3C19694	9.4	0.002000	1500.00	6.50%	8.01	7.30%	9.00	10.20%	12.57	1.50%	1.85	9.90%	12.20	6.80%	8.38	-	-
Telkamp Spray Booth	B-6	KW3C19694*	9.4	0.002000	1500.00	6.50%	8.01	7.30%	9.00	10.20%	12.57	1.50%	1.85	9.90%	12.20	6.80%	8.38	-	-
		KC3C19704	9.3	0.001000	1500.00	9.50%	5.80	5.10%	3.12	11.70%	7.15	2.20%	1.34	14.00%	8.55	4.80%	2.93	-	-
					Totals:		**74.4**		**63.6**		**45.8**		**17.5**		**72.7**		**76.7**		**4.2**
																	Combined HAPs:		**355.1**

Notes
As applied assumes the use of worst case diluent (glycol ether).
* Booth 6 - coatings are mutually exclusive. Worst case scenario (KWC3C19694) used to determine potential to emit.

Methodology:
PTE of HAPs (ton/yr) = Density (lb/gal) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * Weight % HAPs * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Coating Line - PM and HAPs Limits

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Emission Unit	Limited PTE (ton/yr)			Control efficiency	Usage Limits (ton/yr)		
	VOC	Single HAP	Combined HAPs		VOC	Single HAP	Combined HAPs
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)	90.0	8.90	22.0	74.6%	354.20	35.03	86.58

Notes:
PTE of VOC and HAPs are conservatively limited in order for total PTE of the coating line, natural gas combustion, and insignificant units remain below Title V Major threshold.
Control efficiency is the minimum overall efficiency required to comply with 326 IAC 8-2-9 (Page 2 of this appendix).

Methodology:
VOC usage limit (ton/yr) = Limited PTE of VOC (ton/yr) / (1-Control efficiency)
Combined HAPs usage limit (ton/yr) = Limited PTE of combined HAPs of VOC (ton/yr) / (1-Control efficiency)
Single HAP usage limit (ton/yr) = Limited PTE of single HAPs of VOC (ton/yr) / (1-Control efficiency)

Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Emission unit	Emission Unit ID	Number of Units	Heat Input Capacity Each (MMBtu/hr/unit)	Total Potential Throughput (MMCF/yr)
Catalytic thermal oxidizer	Cat-OX #1	1	0.400	3.4
Spray booth drying oven	OV-1	1	3.200	27.5
Boiler	-	1	6.300	54.1
Space heaters	H1 - H3	3	0.100	2.6
HVAC units	HVAC-1 - HVAC-4	4	0.048	1.6
Air make up unit	AM-1	1	5.000	42.9
Air make up unit	AM-2	1	3.000	25.8
Process tank heater	S-10	1	1.000	8.6
Dry-off oven	OV-2	1	1.000	8.6
Steam boiler	-	1	0.382	3.3
		Totals:	**20.774**	**178.4**

	Pollutant						
	PM*	PM_{10}*	Direct $PM_{2.5}$*	SO_2	NO_x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission (tons/yr)	0.17	0.68	0.68	0.05	8.9	0.49	7.49

*PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM_{10} combined. $PM_{2.5}$ emission factor is filterable and condensable $PM_{2.5}$ combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission (tons/yr)	1.873E-04	1.070E-04	6.690E-03	1.606E-01	3.033E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission (tons/yr)	4.460E-05	9.813E-05	1.249E-04	3.390E-05	1.873E-04
				Combined HAPs:	**1.683E-01**

	Greenhouse Gas		
	CO_2	CH_4	N_2O
Emission Factor (lb/MMSCF)	120,000	2.3	2.2
Potential Emission (tons/yr)	10,705	0.2	0.2
Summed Potential Emissions (tons/yr)	10,705		
CO_2e Total (tons/yr)	10,770		

Notes:
MMBtu = 1,000,000 Btu
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
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Methodology:
Total Heat Input Capacity (MMBtu/hr) =∑ (Heat Input Capacity Each (MMBtu/hr/unit) * Number of Units)
Potential Throughput (MMCF/yr) = Heat Input Capacity Each (MMBtu/hr) * Number of Units * 8,760 hrs/yr * High Heat Value (1 MMCF/1,020 MMBtu)
Potential Emission (tons/yr) = Total Max Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs
CO_2e (tons/yr) = CO_2 Potential Emission (tons/yr) * CO_2 GWP (1) + CH_4 Potential Emission (tons/yr) * CH_4 GWP (21) + N_2O Potential Emission (tons/yr) * N_2O GWP (310).

Appendix A: Emissions Calculations
Powder Coating

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Products	Annual usage (lb/yr)	Annual hours operated	Max usage rate (lb/hr)	Weight % solids	Transfer efficiency	Control efficiency
04 Brick Red UD Polyester	6500	182.5	35.6	100%	99%	95.0%

	lb/hr	lb/day	ton/yr
Uncontrolled PTE of PM	0.36	8.55	1.56
Controlled PTE of PM	0.02	0.43	0.08

Note:
These calculations are based on additional information provided by the source on June 19, 2013
Assume PM = PM_{10} = $PM_{2.5}$
Max usage is based on using 6500 lb of powder/yr at a half hour/day averaged over 365 days/yr
According to the environmental data sheet provided by the source, the powder coating contains no VOC or HAPs

Methodology:
Max usage rate (lb/hr) = Annual usage (lb/yr) / Annual hours operated
Uncontrolled PTE of PM (lb/hr) = Max usage rate (lb/hr) * Weight % solids * (1 - Transfer efficiency)
Controlled PTE of PM (lb/hr) = Uncontrolled PTE of PM (lb/hr) * (1 - Control efficiency)
PTE (lb/day) = PTE (lb/hr) * 24 hrs/day
PTE (ton/yr) = PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Welding

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit No.: 097-32751-00127
Reviewer: Ryan Graunke

Process	Max electrode usage (lb/hr)	Emission Factors (lb pollutant/lb electrode)		PTE (lb/hr)		PTE (lb/day)		PTE (ton/yr)	
		PM	Mn	PM	Mn	PM	Mn	PM	Mn
Metal Inert Gas (MIG) (carbon steel)	5.0	0.0055	0.0005	0.028	0.003	0.660	0.060	0.120	0.011

Notes:
These calculations are based on additional information provided by the source on June 19, 2013
Assume PM = PM_{10} = $PM_{2.5}$
There are three MIG stations: 2 with a max usage of 1.0 lb electrode/hr and 1 with a max usage of 3.0 lb electrode/hr
Emission factors are default values for carbon steel
Emission factors are from AP-42 Tables 12.19-1 and 12.19-2

Methodology:
Max electrode usage (lb/hr) = Actual electrode usage / Actual operation hours (hr/yr)
Emissions (lb pollutant//hr) = Max electrode usage (lb/hr) * Emission factor (lb pollutant/lb electrode)
PTE (lb/hr) = Max electrode usage (lb/hr) * Emission factor (lb pollutant/lb electrode)
PTE (lb/day) = Max electrode usage (lb/hr) * Emission factor (lb pollutant/lb electrode) * 24 hrs/day
PTE (ton/yr) = Max electrode usage (lb/hr) * Emission factor (lb pollutant/lb electrode) * 8760 hr/yr * 1 ton/2000 hr

Appendix A: Emissions Calculations
Aluminum Sawing

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Sawing component	Maximum line speed (linear ft/hr)	Max size processed (ft^3/linear ft)	Maximum throughput (ft^3/hr)	Maximum throughput (ton/hr)	Emission factor (lb PM/ton aluminum)	PTE of PM (lb/hr)	PTE of PM (lb/day)	PTE of PM (ton/yr)
Vertical band saw	61.5	0.0556	3.42	0.289	0.0045	0.0013	0.0312	0.0057
Horizontal band saw	24.0	0.0556	1.33	0.113	0.0045	0.0005	0.0122	0.0022
					Totals:	**0.0018**	**0.0433**	**0.0079**

Notes:
These calculations are based on additional information provided by the source on June 19, 2013
Assume PM = PM_{10} = $PM_{2.5}$
Density of aluminum is 169 lb/ft^3, as reported by the source
Emission factor is from FIRE 6.01 SCC#3-04-003-60 (Casting finishing for gray iron foundries).

Methodology:
Aluminum processed (ft^3/linear ft) = 96 in3 * (1 ft^3/1728 in^3)
Maximum throughput (ft^3/hr) = Maximum line speed (linear ft/hr) * Aluminum processed (ft^3/linear ft)
Maximum throughput (ton/hr) = Maximum throughput (ft^3/hr) * Aluminum density (169 lb/ft^3)
PTE of PM (lb/hr) = Maximum throughput (ton/hr) * Emission factor (lb PM/ton aluminum)
PTE of PM (lb/day) = PTE of PM (lb/hr) * 24 hrs/day
PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Anodizing tanks

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Products	Max throughput (gal/hr)	Density (lb/gal)	Max throughput (lb/hr)	Weight % VOC	Surface area of tank (ft^2)	PM emission factor (grains/ft^2-hr)	PTE of PM (lb/hr)	PTE of PM (lb/day)	PTE of PM (ton/yr)	PTE of VOC (ton/yr)
HOUGHTO-ETCH AX-2050[1]	N/A	N/A	4.86	0%	144	4.2	0.09	2.07	0.38	-
HOUGHTO-COLOR A-599	1.08	9.67	10.45	0%	144	4.2	0.09	2.07	0.38	-
HOUGHTO-SEAL A-620	0.8	9.09	7.27	0%	144	4.2	0.09	2.07	0.38	-
HOUGHTO-CLEAN A-1041[1,2]	N/A	N/A	4.41	10%	144	4.2	0.09	2.07	0.38	1.93
HOUGHTO-CLEAN A-1083[1]	N/A	N/A	3.41	0%	144	4.2	0.09	2.07	0.38	-
HOUGHTO-DEOX A-1745L	0.42	11.55	4.85	0%	144	4.2	0.09	2.07	0.38	-
						Total:	**0.52**	**12.44**	**2.27**	**1.93**

Note:
These calculations are based on additional information provided by the source on June 19, 2013
Assume PM = PM_{10} = $PM_{2.5}$
PM emission factor is from AP-42 Section 12.20, Table 12.20-2 for chromic acid anodizing.
Materials contain no HAPs, according to MSDSs provided by the source
Tanks are each 36 ft by 4 ft
[1] These products are powder. Therefore, throughput was provided as lb/hr
[2] HOUGHTON-CLEAN A-1041 is 10% (max) hexylene gycol, which is assumed to be emitted as VOC, worst-case, when dissolved in the bath

Methodology:
Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal)
Max throughput (lb/hr) = Max throughput (gal/hr) * Density (lb/gal)
PTE of PM (lb/hr) = Surface area of tank (ft^2) * PM emission factor (grains/ft^2-hr) * 1 lb/7000 grains
PTE of PM (lb/day) = PTE of PM (lb/hr) * 24 hrs/day
PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of VOC (ton/yr) = Max throughput (lb/hr) * Weight % VOC * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Paint Pre-treat Cleaners

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Products	Max usage (lb/hr)	Weight % HAPs (HF)	PTE of HAPs (HF) (ton/yr)
HOUGHTO-COAT A-840	0.14	30%	0.18
HOUGHTO-CLEAN A-801	0.14	0%	0
HOUGHTO-COAT A-830	0.14	0%	0

Note:
These calculations are based on additional information provided by the source on June 19, 2013
Cleaning is a dip system, therefore there are no particulate emissions.
Cleaners contain no VOC, according to MSDSs provided by the source
HF = Hydrofluoric acid

Methodology:
PTE of HAPs (ton/yr) = Max usage (lb/hr) * Weight % HAPs (HF) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Thermal Fill

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Products	Max usage (gal/yr)	Density (lb/gal)	Weight % VOC	Weight % HAP (MDI)	PTE of VOC (ton/yr)	PTE of HAP (MDI) (ton/yr)
TB 100-30 Component A	440.0	10.34	100%	45%	2.27	1.02
TB 100-30 Component B	440.0	9.01	25%	0%	0.50	-
				Total:	2.77	1.02

Note:
These calculations are based on additional information provided by the source on June 19, 2013
The source uses a maximum of eight 55-gallon drums of each component per year
It is assumed that all of the VOC in the components is emitted to the atmosphere, worst-case
MDI is 4,4'-Diphenylmethane Diisocyanate (CAS # 101-68-8)

Methodology
PTE of VOC (ton/yr) = Max usage (gal/yr) * Density (lb/gal) * Weight % VOC * 1 ton/2000 lbs
PTE of HAP (MDI) (ton/yr) = Max usage (gal/yr) * Density (lb/gal) * Weight % HAP (MDI) * 1 ton/2000 lbs

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit No.: 097-32751-00127
Reviewer: Ryan Graunke

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 Informtation (provided by source)

Type of trip	Max number of vehicles per day	Number of one-way trips per day per vehicle	Max one-way trips per day (trip/day)	Max weight loaded (tons/trip)	Total weight driven per day (ton/day)	Max one-way distance (feet/trip)	Max one-way distance (mi/trip)	Max one-way miles (mi/day)	Max one-way miles (mi/yr)
Vehicle (entering plant) (one-way trip)	3	1	3	25.3	75.9	800	0.152	0.5	165.9
Vehicle (leaving plant) (one-way trip)	3	1	3	17.0	51.0	800	0.152	0.5	165.9
		Totals:	**6**		**126.9**			**0.9**	**331.8**

Average vehicle weight per trip (tons/trip) = 21.2
Average miles per trip (miles/trip) = 0.15

Unmitigated emission factor (lb/mi), $E = k * (sL)^{0.91} * (W)^{1.02}$ (Equation 1 from AP-42 13.2.1)

	PM	PM_{10}	$PM_{2.5}$	
Where: k =	0.011	0.0022	0.00054	= particle size multiplier (lb/vehicle miles) (AP-42 Table 13.2.1-1)
W =	21.2	21.2	21.2	= average vehicle weight (tons)
sL =	9.7	9.7	9.7	= silt loading value (g/m^2) for paved roads at iron and steel production facilities - (AP-42 Table 13.2.1-3)

Mitigated emission factor takes natural mitigation due to precipitation into consideration
Mitigated emission factor (lb/mi), $E_{ext} = E * [1 - (p / 4*N)]$ (Equation 2 from AP-42 13.2.1)
where p = 125 = days of rain greater than or equal to 0.01 inches (see AP-42 Figure 13.2.1-2)
N = 365 = days per year

	PM	PM_{10}	$PM_{2.5}$
Unmitigated emission factor (lb/mi), E =	1.955	0.391	0.0960
Mitigated emission factor (lb/mi), E_{ext} =	1.788	0.358	0.0878

Type of trip	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM_{10} (tons/yr)	Unmitigated PTE of $PM_{2.5}$ (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM_{10} (tons/yr)	Mitigated PTE of $PM_{2.5}$ (tons/yr)
Vehicle (entering plant) (one-way trip)	0.162	0.032	0.0080	0.148	0.030	0.0073
Vehicle (leaving plant) (one-way trip)	0.162	0.032	0.0080	0.148	0.030	0.0073
Totals:	**0.324**	**0.065**	**0.016**	**0.297**	**0.059**	**0.015**

Methodology:
Max one-way trips per day (trip/day) = Max number of vehicles * Number of one-way trips per day per vehicle
Total weight driven per day (ton/day) = Max weight loaded (tons/trip) * Max one-way trips per day (trip/day)
Max one-way distance (mi/trip) = Max one-way distance (feet/trip) * 1 mi/5280 ft
Max one-way miles (mi/day) = Max one-way trips per day (trip/day) * Max one-way distance (mi/trip)
Max one-way miles (mi/yr) = Max one-way miles (mi/day) * 365 days/yr
Average vehicle weight per trip (ton/trip) = ∑ Total weight driven per day (ton/day) / ∑ Max trips per day (trip/day)
Average miles per trip (mi/trip) = ∑ Max one-way miles (miles/day) / ∑ Max trips per year (trip/day)
Unmitigated PTE (tons/yr) = Max one-way miles (miles/yr) * Unmitigated emission factor (lb/mile) * 1 ton/2000 lbs
Mitigated PTE (tons/yr) = Max one-way miles (miles/yr) * Mitigated emission factor (lb/mile) * 1 ton/2000 lbs

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	**Superior Metal Technologies**
Source Location:	**9850 East 30th Street, Indianapolis, Indiana 46229**
County:	**Marion**
SIC Code:	**3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)**
Permit Renewal No.:	**F097-32751-00127**
Permit Reviewer:	**Ryan Graunke**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Superior Metal Technologies relating to the operation of an existing stationary fabrication, anodizing, and surface coating of architectural metal products plant. On January 17, 2013, Superior Metal Technologies submitted an application to the OAQ requesting to renew its operating permit. Superior Metal Technologies was issued a FESOP (F097-7881-00127) on January 22, 1998 and its first FESOP Renewal (F097-15522-00127) on October 21, 2003.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

One (1) Coating Line, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

These four booths use dry filters for particulate matter overspray control, are contained within a total enclosure paint tunnel maintained under negative pressure, and use a natural gas fired catalytic thermal oxidizer for VOC control, identified as Cat-OX #1, with a maximum heat input of 0.4 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Under 40 CFR 63, Subpart HHHHHH (6H), the coating line is considered part of an affected source.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

(2) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input capacity of 6.3 million Btu per hour;

(3) Fifteen (15) natural gas fired space heaters, identified as H1 through H15, each with a maximum heat input capacity of 0.1 million Btu per hour;

(4) Four (4) natural gas fired HVAC units, identified as HVAC-1 through HVAC-4, each with a maximum heat input capacity of 0.048 million Btu per hour;

(5) One (1) natural gas fired air make up unit, identified as AM-1, with a maximum heat input capacity of 5.0 million Btu per hour;

(6) One (1) natural gas fired air make up unit, identified as AM-2, with a maximum heat input capacity of 3.0 million Btu per hour;

(7) One (1) natural gas fired process tank heater, identified as S-10, with a maximum heat input capacity of 1.0 million Btu per hour;

(8) One (1) natural gas fired dry off oven, identified as OV-2, with a maximum heat input capacity of 1.0 million Btu per hour; and

(9) One (1) natural gas fired steam boiler with a maximum heat input capacity of 0.382 million Btu per hour.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr;

(c) Paved roads and parking lots with public access;

(d) Anodizing system consisting of between 26 and 36 tanks. Each tank contains one of the following solutions; soap, caustic, anodize, color, sealer, water or deionized water rinse;

(e) Alkaline cleaner, chrome phosphate, citrus acid and rinse tanks and an associated dry off oven for miscellaneous metal parts cleaning in preparation for surface coating application(s);

(f) Storage tanks with capacity less than or equal to 1000 gallons and annual throughputs less than 12,000 gallons. Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;

(g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment;

(i) Closed loop heating and cooling systems;

(j) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%;

(k) Heat exchanger cleaning and repair;

(l) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process; and

(m) Blowdown for any of the following: sight glass, boiler, compressor, pump or cooling tower.

New Emission Units and Pollution Control Equipment Added to the Source

There are no new units added to the source in this renewal.

Emission Units and Pollution Control Equipment Removed From the Source

There are no units removed from the source in this renewal.

Existing Approvals

Since the issuance of the FESOP (097-15522-00127) on October 21, 2003, the source has constructed or has been operating under the following additional approvals:

(a) First Significant Permit Revision No. 097-20224-00127, issued on April 26, 2005;

(b) First Administrative Amendment No. 097-25853-00127, issued on January 17, 2008;

(c) Second Significant Permit Revision No. 097-26172-00127, issued on August 15, 2008;

(d) Second Administrative Amendment No. 097-27263-00127, issued on January 2, 2009;

(e) Third Administrative Amendment No. 097-28084-00127, issued on June 10, 2009; and

(f) Third Significant Permit Revision No. 097-29670-00127, issued on January 6, 2011.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O_3	Attainment effective November 8, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.
Basic nonattainment designation effective federally April 5, 2005, for $PM_{2.5}$.

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

(b) $PM_{2.5}$
Marion County has been classified as nonattainment for $PM_{2.5}$ in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. Therefore, direct $PM_{2.5}$, SO_2, and NO_x emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

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

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	83.80
PM_{10}	84.39
$PM_{2.5}$	84.39
SO_2	0.06
NO_x	10.29
VOC	468.5
CO	8.65
GHGs as CO_2e	12,429
Single HAP	77.7 (Glycol ethers)
Total HAP	357.81

HAPs	Tons/year
Xylene	74.4
Toluene	63.6
Methyl isobutyl ketone	45.8
Ethyl Benzene	17.5
Dimethyl phthalate	72.7
Glycol ethers	77.7
Chromium compounds	4.2
Hexane	0.19
Total	**357.81**

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

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

(d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

Potential to Emit After Issuance

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

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
Process/ Emission Unit	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Coating Line (B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	90.00	-	-	22.00	8.90 (Glycol ethers)
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.3	0.57	8.65	12,429	0.19	0.19 (Hexane)
Insignificant Activities ***	5.00	5.00	5.00			5.00			2.5	1.00 (Glycol ethers)
Total PTE of Entire Source	**83.80**	**84.39**	**84.39**	**0.06**	**10.3**	**95.57**	**8.65**	**12,429**	**24.69**	**9.90 (Glycol ethers)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	100,000 CO_2e	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
***PTE of insignificant activities is assuming the emissions thresholds for insignificant units.

(a) FESOP Status

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

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

(a) The total input of VOC at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), including VOC cleaners and solvents, shall not exceed 354.20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The total input of any single HAP at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), shall not exceed 35.03 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The total input of the combined HAPs at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), shall not exceed 86.58 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(d) The overall control efficiency of the catalytic thermal oxidizer (Cat-Ox #1) shall be greater than or equal to 74.6%.

(e) The paint tunnel as a total enclosure with negative pressure shall be in operation at all times when the Coating Line is in operation.

Limited VOC emissions = (354.20 tons/yr)*(1-0.746) = 90.0 tons/yr

Limited single HAP emissions = (35.03 tons/yr)*(1-0.746) = 8.90 tons/yr

Limited combined HAPs emissions = (86.58 tons/yr)*(1-0.746) = 22.0 tons/yr

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

Minor corrections have been made to these limitations to correct for rounding errors in the existing permit. This is a Title I change.

(b) PSD Minor Source
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit all attainment regulated criteria pollutants (except VOC) are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) 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.

The unlimited VOC PTE is greater than 250 tons/year, the FESOP limit as explained above also renders 326 IAC 2-2 not applicable.

(c) Nonattainment New Source Review
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers ($PM_{2.5}$), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

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

New Source Performance Standards (NSPS)

(b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60, Subpart Dc), are still not included in the permit for the natural gas fired boilers because the boilers each have a maximum heat input capacity less than 10 million Btu per hour.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM (4M)) are still not included in the permit for the Coating Line because the source is not a major source of HAPs.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD (5D)) are still not included in the permit for the natural gas fired boilers because the source is not a major source of HAPs.

(f) This source is still subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart HHHHHH (6H)) because the source performs spray application of metal parts with coatings containing greater than 0.1 percent chromium (Cr).

The units subject to this rule include the following:

One (1) Coating Line, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

These four booths use dry filters for particulate matter overspray control, are contained within a total enclosure paint tunnel maintained under negative pressure, and use a natural gas fired catalytic thermal oxidizer for VOC control, identified as Cat-OX #1, with a maximum heat input of 0.4 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Non applicable portions of the NESHAP will not be included in the permit. The source is subject to the following portions of Subpart HHHHHH (6H).

(1) 40 CFR 63.11169(c)
(2) 40 CFR 63.11170(a)(3) and (b)
(3) 40 CFR 63.11171(a), (b), and (e)
(4) 40 CFR 63.11172(b)
(5) 40 CFR 63.11173(e), (f), (g)(2), and (g)(3)

(6) 40 CFR 63.11174
(7) 40 CFR 63.11175(a),(b)
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177(a), (b), (c), (d), (g), and (h)
(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180
(13) Table 1 to Subpart HHHHHH (6H) of Part 63

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart HHHHHH (6H).

There are no testing requirements included in this NESHAP.

This is an existing applicable requirement and no change has been made in this second renewal.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR Part 63, Subpart XXXXXX (6X)) are still not included in the permit for the Coating Line because the source is not primarily engaged in the operation of one of the nine source categories listed in 40 CFR 63.11514(a).

(h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

The following state rules are applicable to the source:

(a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the Coating Line is greater than ten (10) tons per year for any single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the Coating Line to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. In addition, the Coating Line spray booths (Spray Booths: B-1, B-2, B-5, and B-6) were installed in 1989, prior to the July 27, 1997 rule applicability data. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.

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

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

(1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

(g) 326 IAC 6.5 (PM Limitations Except Lake County)
The source is located in Marion County, and even though the PM PTE is less than 100 tons per year, the source could potentially emit greater than ten (10) tons per year of particulate. Therefore, the source is subject to the requirements of 326 IAC 6.5. This is a new requirement to the source. Note: Actual emissions are not available. This is a Title I change.

<u>Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)</u>

(h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3-2 do not apply to the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) because the unit is already subject to 326 IAC 6.5. This reevaluation of this rule resulted in the removal of an existing condition required under 326 IAC 6-3. This is a Title I change.

(i) 326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf). This is a new requirement to the source. This is a Title I change.

The source shall comply with this requirement by continuing to use dry filters for each spray booth.

(j) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) is subject to the requirements of 326 IAC 8-2-9 because it was existing as of July 1, 1990, is located in Marion County, performs metal surface coating under SIC code 3479, and has VOC emissions greater than fifteen (15) pounds per day.

(1) Pursuant to 326 IAC 8-2-9(c)(2), the owner or operator shall not discharge into the atmosphere VOC from the Coating Line in excess of 3.5 pounds of VOC per gallon of coating, excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 90°C (194°F).

(2) Since the coatings used have VOC content greater than 3.5 pounds of VOC per gallon of coating, excluding water, the source complies with the requirement by using a catalytic thermal oxidizer (Cat-Ox #1).

(i) The first step is to determine the equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Pursuant to 326 IAC 8-1-2(b), the VOC emissions from the Coating Line shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

E = L / (1 - (L/D)

Where:

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating (3.5 pounds of VOC per gallon of coating, excluding water);
D = Density of VOC in coating in pounds per gallon of VOC;

A solvent density of 7.36 pounds of VOC per gallon of solvent in the coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2(a).

Based on this equation, the pounds of VOC per gallon of coating solids shall be limited to less than or equal to 6.67 pounds of VOC per gallon coating solids as applied.

(ii) The second step is to determine the minimum control efficiency of the catalytic using the equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the catalytic thermal oxidizer (Cat-Ox #1) shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} * 100$$

Where:

V = The actual VOC content of the coatings as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

In order for the worst-case coating, KW3C19694, with a VOC content of 26.32 pounds of VOC per gallon of coating solids as applied, to comply with 326 IAC 8-2-9, the overall control efficiency of the catalytic thermal oxidizer (Cat-Ox #1) shall be greater than or equal to 74.6%.

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

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

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

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

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

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

This is an existing applicable requirement and no change has been made in this second renewal.

Natural Gas Combustions Units

(k) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(e), the requirements of 326 IAC 6-2 do not apply to the two (2) natural gas fired boilers because the units are already subject to 326 IAC 6.5. This reevaluation of this rule resulted in the removal of an existing condition required under 326 IAC 6-3. This is a Title I change.

(l) 326 IAC 6.5 (PM Limitations Except Lake County)
(1) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from the two (2) natural gas-fired boilers shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).
(2) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from all other natural gas combustion units shall not exceed three-hundredth (0.03) grain per dry standard cubic foot (dscf).
This is a new requirement to the source. This is a Title I change.

(m) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas fired combustion units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

(n) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.

(o) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)

The natural gas fired combustion units are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there are no applicable emission limits for the source under 326 IAC 9-1-2.

(p) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas fired combustion units are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because they have potential to emit NO_x less than forty (40) tons per year.

Insignificant anodizing system

(q) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3-2 do not apply to the insignificant anodizing system because it is already subject to 326 IAC 6.5.

(r) 326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant anodizing system shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf). This is a new requirement to the source. This is a Title I change.

Insignificant welding

(s) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3-2 do not apply to the insignificant welding operation because it is already subject to 326 IAC 6.5.

(t) 326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant welding operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf). This is a new requirement to the source. This is a Title I change.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

Emission Units	Control Device	Pollutant	Frequency of Testing
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)	Catalytic thermal oxidizer (Cat-Ox #1)	VOC, single and combined HAPs	Once every 5 years from the date of the most recent compliance demonstration

The Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) is controlled by one catalytic thermal oxidizer. The minimum overall efficiency of the catalytic thermal oxidizer (Cat-Ox #1) is 74.6% in order for the worst-case coating to comply with 326 IAC 8-2-9, see Calculations in Appendix A of this TSD. The last valid compliance demonstration was conducted on June 29, 2010.

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

Control	Parameter	Frequency
Catalytic thermal oxidizer (Cat-Ox #1)	Temperature	Continuous and 3-hr average
	Fan amperage	Once per day
Dry Filters	Filter check	Once per day
	Overspray observation	Once per week
	Stack exhaust observations	Once per month

These monitoring conditions are necessary because the catalytic thermal oxidizer for the Coating Line must operate properly to comply with 326 IAC 2-8-4 (FESOP), 326 IAC 8-2-9 (Miscellaneous Metal Coating), and 40 CFR Part 63, Subpart HHHHHH (6H), and render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

The dry filters for the Coating Line must operate properly to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 17, 2013.

Conclusion

The operation of this stationary fabrication, anodizing, and surface coating of architectural metal products plant shall be subject to the conditions of the attached FESOP Renewal No. 097-32751-00127.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Ryan Graunke at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

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

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

Appendix A: Emissions Calculations
Summary of Emissions

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Unlimited Potential to Emit (tons/yr)

Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Combined HAPs	Single HAP	
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	462.9	-	-	355.1	76.7	Glycol Ethers
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.3	0.57	8.65	12,429	0.19	0.19	Hexane
Other Insignificant Units*	5.00	5.00	5.00	-	-	5.00	-	-	2.50	1.00	Glycol Ethers
Total	**83.80**	**84.39**	**84.39**	**0.06**	**10.29**	**468.50**	**8.65**	**12,429**	**357.81**	**77.75**	**Glycol Ethers**

Limited Potential to Emit (tons/yr)

Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Combined HAPs	Single HAP	
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	90.00	-	-	22.00	8.90	Glycol Ethers
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.3	0.57	8.65	12,429	0.19	0.19	Hexane
Other Insignificant Units*	5.00	5.00	5.00	-	-	5.00	-	-	2.50	1.00	Glycol Ethers
Total	**83.80**	**84.39**	**84.39**	**0.06**	**10.29**	**95.57**	**8.65**	**12,429**	**24.69**	**9.90**	**Glycol Ethers**

* PTE of insignificant activities is assuming the emissions thresholds for insignificant units.

Appendix A: Emissions Calculations
Coating Line - VOC and PM (Unlimited)

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hour)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Binks Spray Booth	B-1	KY1C17839 (As supplied)	10.6	45.0%	0.0%	45.0%	0.0%	26.00%										
		As applied	**10.1**	**56.0%**	**0.0%**	**56.0%**	**0.0%**	**26.00%**	**0.0040**	**1500.0**	**5.66**	**5.66**	**21.75**	**33.9**	**814.5**	**148.6**	**29.2**	**75%**
Binks Spray Booth	B-2	KY1C17839 (As supplied)	10.6	45.0%	0.0%	45.0%	0.0%	26.00%										
		As applied	**10.1**	**56.0%**	**0.0%**	**56.0%**	**0.0%**	**26.00%**	**0.0040**	**1500.0**	**5.66**	**5.66**	**21.75**	**33.9**	**814.5**	**148.6**	**29.2**	**75%**
Telkamp Spray Booth	B-5	KW3C19694 (As supplied)	9.7	59.0%	0.0%	59.0%	0.0%	24.00%										
		As applied	**9.4**	**67.2%**	**0.0%**	**67.2%**	**0.0%**	**24.00%**	**0.0020**	**1500.0**	**6.30**	**6.30**	**26.26**	**18.9**	**453.8**	**82.8**	**10.1**	**75%**
Telkamp Spray Booth	B-6	KW3C19694 (As supplied)	9.7	59.0%	0.0%	59.0%	0.0%	24.00%										
		As applied*	**9.4**	**67.2%**	**0.0%**	**67.2%**	**0.0%**	**24.00%**	**0.0020**	**1500.0**	**6.30**	**6.30**	**26.26**	**18.9**	**453.8**	**82.8**	**10.1**	**75%**
		KC3C19704 (As supplied)	9.1	72.0%	0.0%	72.0%	0.0%	39.00%										
		As applied	**9.3**	**77.6%**	**0.0%**	**77.6%**	**0.0%**	**39.00%**	**0.0010**	**1500.0**	**7.22**	**7.22**	**18.50**	**10.8**	**259.8**	**47.4**	**3.4**	**75%**
													Total:	**105.7**	**2536.6**	**462.9**	**78.6**	

Notes
As applied assumes the use of worst case diluent (glycol ether).
* Booth 6 - coatings are mutually exclusive. Worst case scenario (KWC3C19694) used to determine potential to emit.

Methodology:
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

Compliance with 326 IAC 8-2-9

Emission Unit	Emission Unit ID	Material	Equivalent emission limit (lb VOC/gal coating solids)	VOC content (lb/gal coating solids)	Overall control efficiency
Binks Spray Booth	B-1	KY1C17839	6.67	21.75	69.3%
Binks Spray Booth	B-2	KY1C17839	6.67	21.75	69.3%
Telkamp Spray Booth	B-5	KW3C19694	6.67	26.26	74.6%
Telkamp Spray Booth	B-6	KW3C19694	6.67	26.26	74.6%
		KC3C19704	6.67	18.50	63.9%

Note:
The minimum control efficiency of the catalytic thermal oxidizer shall be greater than or equal to 74.6%

Methodology:
Pursuant to 8-1-2(b)(1), the equivalent VOC emissions limit is 4.02 lb VOC/gal of coating solids, as applied, calculated using the equation: E = L/(1-L/D)
Where: E = Equivalent emission limit in lb VOC/gal of coating solids, as applied
L = Emission limit from 326 IAC 8-2-9 (3.5 lb VOC/gal of coating less water)
D = Baseline solvent density of VOC in coating (7.36 lb VOC/gal of solvent)
Pursuant to 8-1-2(c), the overall efficiency of the thermal oxidizer is calculated using the equation: O=(V-E)/V*100
Where: O = Equivalent overall efficiency of the thermal oxidizer as a percentage
V = The weighted average VOC contents of all coatings in lb VOC/gal of coating solids, as applied
E = Equivalent emission limit = (6.67 lb VOC/gal of coating solids, as applied)

Appendix A: Emission Calculations
Coating Line - HAPs (Unlimited)

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum throughput (unit/hour)	Xylene		Toluene		Methyl Isobutyl Ketone		Ethyl Benzene		Dimethyl phthalate		Glycol Ethers		Chromium Compounds	
						Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)
Binks Spray Booth	B-1	KY1C17839	10.1	0.004000	1500.00	11.00%	29.20	8.60%	22.83	3.90%	10.35	2.60%	6.90	9.10%	24.15	11.30%	29.99	0.80%	2.12
Binks Spray Booth	B-2	KY1C17839	10.1	0.004000	1500.00	11.00%	29.20	8.60%	22.83	3.90%	10.35	2.60%	6.90	9.10%	24.15	11.30%	29.99	0.80%	2.12
Telkamp Spray Booth	B-5	KW3C19694	9.4	0.002000	1500.00	6.50%	8.01	7.30%	9.00	10.20%	12.57	1.50%	1.85	9.90%	12.20	6.80%	8.38	-	-
Telkamp Spray Booth	B-6	KW3C19694*	9.4	0.002000	1500.00	6.50%	8.01	7.30%	9.00	10.20%	12.57	1.50%	1.85	9.90%	12.20	6.80%	8.38	-	-
		KC3C19704	9.3	0.001000	1500.00	9.50%	5.80	5.10%	3.12	11.70%	7.15	2.20%	1.34	14.00%	8.55	4.80%	2.93	-	-
					Totals:		**74.4**		**63.6**		**45.8**		**17.5**		**72.7**		**76.7**		**4.2**
																	Combined HAPs:		**355.1**

Notes
As applied assumes the use of worst case diluent (glycol ether).
* Booth 6 - coatings are mutually exclusive. Worst case scenario (KWC3C19694) used to determine potential to emit.

Methodology:
PTE of VOC (ton/yr) = Density (lb/gal) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * Weight % HAPs * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Coating Line - PM and HAPs Limits

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Emission Unit	Limited PTE (ton/yr)			Control efficiency	Usage Limits (ton/yr)		
	VOC	Single HAP	Combined HAPs		VOC	Single HAP	Combined HAPs
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)	90.0	8.90	22.0	74.6%	354.20	35.03	86.58

Notes:
PTE of VOC and HAPs are conservatively limited in order for total PTE of the coating line, natural gas combustion, and insignificant units remain below Title V Major threshold.
Control efficiency is the minimum overall efficiency required to comply with 326 IAC 8-2-9 (Page 2 of this appendix).

Methodology:
VOC usage limit (ton/yr) = Limited PTE of VOC (ton/yr) / (1-Control efficiency)
Combined HAPs usage limit (ton/yr) = Limited PTE of combined HAPs of VOC (ton/yr) / (1-Control efficiency)
Single HAP usage limit (ton/yr) = Limited PTE of single HAPs of VOC (ton/yr) / (1-Control efficiency)

Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Reviewer: Ryan Graunke

Emission unit	Emission Unit ID	Number of Units	Heat Input Capacity Each (MMBtu/hr/unit)	Total Potential Throughput (MMCF/yr)
Catalytic thermal oxidizer	Cat-OX #1	1	0.400	3.4
Spray booth drying oven	OV-1	1	3.200	27.5
Boiler	-	1	6.300	54.1
Space heaters	H1 - H15	15	0.100	12.9
HVAC units	HVAC-1 - HVAC-4	4	0.048	1.6
Air make up unit	AM-1	1	5.000	42.9
Air make up unit	AM-2	1	3.000	25.8
Process tank heater	S-10	1	1.000	8.6
Dry-off oven	OV-2	1	1.000	8.6
Steam boiler	-	1	0.382	3.3
Internal combustion engine	-	1	2.000	17.2
		Totals:	**23.974**	**205.9**

	Pollutant						
	PM*	PM_{10}*	Direct $PM_{2.5}$*	SO_2	NO_x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission (tons/yr)	0.20	0.78	0.78	0.06	10.3	0.57	8.65

*PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM_{10} combined. $PM_{2.5}$ emission factor is filterable and condensable $PM_{2.5}$ combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission (tons/yr)	2.162E-04	1.235E-04	7.721E-03	1.853E-01	3.500E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission (tons/yr)	5.147E-05	1.132E-04	1.441E-04	3.912E-05	2.162E-04
				Combined HAPs:	**1.943E-01**

	Greenhouse Gas		
	CO_2	CH_4	N_2O
Emission Factor (lb/MMSCF)	120,000	2.3	2.2
Potential Emission (tons/yr)	12,354	0.2	0.2
Summed Potential Emissions (tons/yr)	12,354		
CO_2e Total (tons/yr)	12,429		

Notes:
MMBtu = 1,000,000 Btu
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
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Methodology:
Total Heat Input Capacity (MMBtu/hr) = ∑ (Heat Input Capacity Each (MMBtu/hr/unit) * Number of Units)
Potential Throughput (MMCF/yr) = Heat Input Capacity Each (MMBtu/hr) * Number of Units * 8,760 hrs/yr * High Heat Value (1 MMCF/1,020 MMBtu)
Potential Emission (tons/yr) = Total Max Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs
CO_2e (tons/yr) = CO_2 Potential Emission (tons/yr) * CO_2 GWP (1) + CH_4 Potential Emission (tons/yr) * CH_4 GWP (21) + N_2O Potential Emission (tons/yr) * N_2O GWP (310).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Curt Lamb
Superior Metal Technologies
9850 E 30th St
Indianapolis, IN 46229

DATE: July 25, 2013

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

SUBJECT: Final Decision
FESOP - Renewal
097 - 32751 - 00127

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

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

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

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

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 25, 2013

TO: Warren Library

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

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

Applicant Name: Superior Metal Technologies
Permit Number: 097 - 32751 - 00127

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	LPOGOST 7/25/2013 Superior Metal Technologies 097 - 32751 - 00127 final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 *(Health Department)*									
3		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 *(Local Official)*									
4		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 *(Local Official)*									
5		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 *(Local Official)*									
6		Warren Library 9701 E 21st Street Indianapolis IN 46229 *(Library)*									
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