



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: August 21, 2013

RE: Aerofab, Division of Tube Processing Corporation / 097 - 33030 - 00011

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



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

Dan Seybert
Aerofab, Division of Tube Processing Corporation
604 East LeGrande Avenue
Indianapolis, IN 46203

August 21, 2013

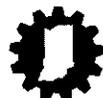
Re: 097-33030-00011
Second Significant Revision to
F097-30090-00011

Dear Mr. Seybert:

Aerofab, Division of Tube Processing Corporation was issued a Federally Enforceable State Operating Permit (FESOP) No. F097-30090-00011 on June 6, 2011 for a stationary steel tubing/fabrication repair plant located at 604 East LeGrande Avenue, Indianapolis, IN 46203. On April 1, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to add a thermal spray booth, identical to other units already permitted at the source, and to begin utilizing Isopropyl Alcohol in place of Acetone as part of their cleanup operation. On June 5, 2013, the Office of Air Quality (OAQ), received a request via a phone conversation to add an additional thermal spray booth identical to the other units already permitted at the source. The necessary application forms for this additional thermal spray paint booth were received on June 14, 2013. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source and permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.



A State that Works

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Tamera Wessel of my staff at 317-234-8530 or 1-800-451-6027, and ask for extension 4-8530.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/tw

cc: File - Marion County
Marion County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



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

New Source Review and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Aerofab, Division of Tube Processing Corporation
604 East LeGrande Avenue
Indianapolis, Indiana 46203**

(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.

This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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.: F097-30090-00011	
Original Signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 6, 2011 Expiration Date: June 6, 2016

First Significant Permit Revision No.: 097-31173-00011, issued on March 20, 2013

Second Significant Permit Revision No.: F097-33030-00011	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 21, 2013 Expiration Date: June 6, 2016

TABLE OF CONTENTS

A. SOURCE SUMMARY	4
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
B. GENERAL CONDITIONS	7
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2 8 6]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
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]	
B.16 Permit Renewal [326 IAC 2-8-3(h)]	
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19 Source Modification Requirement [326 IAC 2-8-11.1]	
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]	
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
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]	
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	16
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1 Overall Source Limit [326 IAC 2-8]	
C.2 Opacity [326 IAC 5-1]	
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5 Fugitive Dust Emissions [326 IAC 6-4]	
C.6 Stack Height [326 IAC 1 7]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]	

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

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

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23

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

- D.1.1 Hazardous Air Pollutants (HAP) Limitations [326 IAC 2-4.1] [326 IAC 2-8-4].
- D.1.2 FESOP Limitations [326 IAC 2 8 4] [326 IAC 2-1.1-5]
- D.1.3 Particulate Matter (PM) PSD Minor Limits [326 IAC 2-2]
- D.1.4 Particulate Matter (PM) [326 IAC 6.5-1-2]
- D.1.5 Preventive Maintenance Plan [326 IAC 2 8 4(9)]

Compliance Determination Requirements

- D.1.6 Particulate Control

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

- D.1.7 Visible Emissions Notations
- D.1.8 Parametric Monitoring
- D.1.9 Broken or Failed Bag Detection

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

- D.1.10 Record Keeping Requirement

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 27

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

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

Certification Form 30
Emergency Occurrence Form 31
Quarterly Deviation and Compliance Monitoring Report Form 32

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 Steel tubing/Fabrication Repair.

Source Address:	604 East LeGrande Avenue, Indianapolis, Indiana 46203
General Source Phone Number:	(317) 782-9628
SIC Code:	3498 (Fabricated Pipe and Pipe Fittings), 3444 (Sheet Metal Work)
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 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:

- (a) One (1) enclosed paint booth, constructed in 2002, used to apply coatings to a limited quantity of small aviation components, identified as EU1, with a maximum capacity to paint approximately 268 aerospace components of various types per month. EU1 uses dry filters, DF1, as control equipment, and exhausts to S1.
- (b) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU2, constructed in 1987, with a maximum coating capacity of 23.8 pounds of metal powder per hour; utilizing a Torit Dust Collector, identified as 2101, as particulate control and exhausting through vent S2.
- (c) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.
- (d) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.
- (e) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.
- (f) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified

as EU15 and EU16, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.

- (g) One (1) cleanup operation utilizing acetone and isopropyl alcohol as solvents and a maximum usage rate of 0.27 gallons per hour.

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) One (1) toluene pretreatment cleaning operation, constructed in 1987, using a toluene based precleaner called Turco pretreat on titanium parts in order to prevent scale formation during the thermal spraying operation, identified as EU5, with a maximum capacity to use approximately 110 gallons of Turco pretreat per year. EU5 uses no control equipment, and exhausts to S4.
- (b) One (1) Titanium etching process, constructed in 1986, which uses Nitric Acid, identified as EU7, using approximately 1,155 gallons of 68%-72% Nitric Acid per year, with no control equipment, and exhausting to S4.
- (c) Several Laser Cutting Operations, identified together as EU9, constructed in 1988, all laser cutting operations (EU9) are controlled by Baghouse, BH5, and exhaust to S5.
- (d) Forty-one (41) gas fired combustion units, identified as EU10, with the Trane units constructed in 2009 and all other units constructed in 2001, with a combined capacity of 11.03 MMBtu/hr, using no controls and venting inside the building. The following table describes the units in more detail:

Equipment ID	MMBTU/hr rating
Radiant Heaters, Combustion Research Corp, M/N 0600NG (24 @ 0.24 MMBtu/hr each)	5.76
Radiant Heater, Combustion Research Corp, M/N 0800NG	0.13
Radiant Heaters, Combustion Research Corp, M/N 0845NG (2 @ 0.20 MMBtu/hr each)	0.40
Radiant Heater, Combustion Research Corp, M/N 0900NG	0.11
HVAC, Trane, M/N YCH300B4HOGA	0.40
HVAC, Trane, M/N YCH108B4HOFA	0.40
HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Trane, M/N 2TXC0061AC3HCAA	0.40
HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Carrier, M/N 48TJE016	0.40
HVAC, Bryant, M/N 580DPV090180ABAA	0.40
HV, Reznor, M/N EEXL225	0.23
HV, Reznor, M/N XL200	0.20
HV, Reznor, M/N F200	0.20
HV, Dayton, M/N 3E230B	0.40

Total (41 units)	11.03
-------------------------	--------------

- (e) Various welding operations, including four (4) semi-automatic TIG welders, eleven (11) TIG line welder, four (4) TIG welding stations, and three (3) MIG welding stations. Maximum electrode usage is 1 pound per hour each for MIG and TIG operations. All welding operations are controlled with various dust collectors.
- (f) An acid cleaning department consisting of various steam cleaning and acid immersion tanks. This includes a sodium hydroxide tank, a nitric acid tank, a sodium chromate tank, and a chromic acid/phosphoric acid tank. All acid cleaning activities with the exception of the nitric acid tank for the titanium etching activity (accounted for in emission calculations) result in no VOC or HAP emissions, and are not included in the emission calculations.
- (g) Various fabrication processes, consisting of forming, sizing, pressing, machining, grinding, cutting and drilling. Various pieces of equipment are located throughout the facility to accomplish these tasks. Some of this equipment includes argon fired heat treating furnaces, thermal presses, electric ovens, mills, lathes, drills, grinders, sanders, buffing wheels, and deburring brushes. None of this equipment is expected to generate significant amounts of criteria or HAP pollutants, in addition, many of these emission sources are considered exempt pursuant to 326 IAC 2-1.1-3.
- (h) Metal conditioning emissions, including plating, anodizing, and hardening. The plating process consists of a sodium hydroxide tank, a sulfuric acid tank, a nickel strike tank, and a nickel sulfamate tank. None of the materials used in the plating process consist of VOC or HAP emissions.
- (i) Non destructive testing of parts for cracks and other defects.

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) for 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, F097-30090-00011, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.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]

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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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) 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.

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

B.12 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 F097-30090-00011 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 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), 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 gasses (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) 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 one hundred (100) 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.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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.8 Performance Testing [326 IAC 3-6]

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

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

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

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

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

C.10 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.11 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.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

The ERP 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) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

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:

- (a) One (1) enclosed paint booth, constructed in 2002, used to apply coatings to a limited quantity of small aviation components, identified as EU1, with a maximum capacity to paint approximately 268 aerospace components of various types per month. EU1 uses dry filters, DF1, as control equipment, and exhausts to S1.
- (b) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU2, constructed in 1987, with a maximum coating capacity of 23.8 pounds of metal powder per hour; utilizing a Torit Dust Collector, identified as 2101, as particulate control and exhausting through vent S2.
- (c) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.
- (d) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.
- (e) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.
- (f) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU15 and EU16, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.

(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 Hazardous Air Pollutants (HAP) Limitations [326 IAC 2-4.1] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-4.1 (MACT) not applicable, the hazardous air pollutants emissions from the Torit Dust Collections (2100, 2101, 2102, 2156 and DC2) shall be limited as follows:

- (a) The emission of any single HAP shall not exceed the following:

HAP	Emission Limit (lb/hr)				
	2100	2101	2102	2156	DC2
Cobalt	0.38	0.19	0.38	0.38	0.38
Chromium	0.38	0.19	0.38	0.38	0.38
Nickel	0.38	0.19	0.38	0.38	0.38

- (b) The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for 2100.
- (c) The total emissions of any combination of HAPs shall not exceed 0.57 pounds per hour for 2101.
- (d) The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for 2102.
- (e) The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for 2156.
- (f) The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for DC2.

Compliance with these limits, combined with the potential to emit of HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of 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 2-4.1 (MACT) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 FESOP Limitations [326 IAC 2-8-4] [326 IAC 2-1.1-5]

- (a) Pursuant to 326 IAC 2-8-4 (FESOP), PM10 emissions from Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) shall not exceed the following:

PM10 Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
4.56	2.28	4.56	4.56	4.56

- (b) Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, PM2.5 emissions for the Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) shall not exceed the following:

PM2.5 Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
4.56	2.28	4.56	4.56	4.56

Compliance with these limitations, combined with the potential to emit PM10 and PM2.5 from other emission units at this source, shall limit the source-wide PTE of PM10 and PM2.5, to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

D.1.3 Particulate Matter (PM) PSD Minor Limits [326 IAC 2-2]

In order to render the 326 IAC 2-2 (PSD) requirements not applicable, particulate matter (PM) emissions from the Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) shall not exceed the following:

PM Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
12.31	6.16	12.31	12.31	12.31

Compliance with this limitation, combined with the potential to emit PM from other emission units at this source, shall limit the source-wide PTE of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirement of 326 IAC 2-2 not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, particulate emissions from the enclosed paint booth ((EU1) and the nine (9) thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, EU15, and EU16), shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 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 the enclosed paint booth ((EU1), the nine (9) thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, EU15 and EU16) and their control devices, identified as DF1, 2100, 2101, 2102, 2156, and DC2. 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 Particulate Control

- (a) In order to comply with Conditions D.1.1, D.1.2, D.1.3, and D.1.4 the Torit Dust Collectors, identified as 2100, 2101, 2102, 2156 and DC2, shall be in operation and control emissions at all times the thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, EU15, and EU16) are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) day or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the result of any response actions take up to the time of notification.

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

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the Torit Dust Collectors, identified as 2100, 2101, 2102, 2156 and DC2, exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation

D.1.8 Parametric Monitoring

The Permittee shall record the pressure drops across the Torit Dust Collectors, identified as

2100, 2101, 2102, 2156 and DC2, used in conjunction with thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, EU15, and EU16), at least once per day when any thermal spray coating booth is in operation. When for any one reading, the pressure drop across any Torit Dust Collector is outside the normal range of 1.0 to 6.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take reasonable steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least every six (6) months.

D.1.9 Broken or Failed Bag Detection

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

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

D.1.10 Testing Requirements [326 IAC 2-8-5] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform chromium, cobalt and nickel testing for the thermal spray paint booths baghouse DC2, no later than one hundred eighty (180) days after initial startup of the 2 thermal spray coating booths controlled by baghouse DC2, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration, on either Torit dust collector 2100, 2101, 2102, 2156, or DC2. The source will test the baghouse for which the longest period of time has passed since the last valid compliance test. 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.

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

D.1.11 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the visible emission notations of the Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the pressure drop across the Torit Dust Collectors (2100, 2101, 2102,

2156 and DC2) controlling the thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, EU15, and EU16). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities:

- (a) Several Laser Cutting Operations, identified together as EU9, constructed in 1988, all laser cutting operations (EU9) are controlled by Baghouse, BH5, and exhaust to S5.
- (b) Forty-one (41) gas fired combustion units, identified as EU10, with the Trane units constructed in 2009 and all other units constructed in 2001, with a combined capacity of 11.03 MMBtu/hr, using no controls and venting inside the building. The following table describes the units in more detail:

<u>Equipment ID</u>	<u>MMBTU/hr rating</u>
Radiant Heaters, Combustion Research Corp, M/N 0600NG (24 @ 0.24 MMBtu/hr each)	5.76
Radiant Heater, Combustion Research Corp, M/N 0800NG	0.13
Radiant Heaters, Combustion Research Corp, M/N 0845NG (2 @ 0.20 MMBtu/hr each)	0.40
Radiant Heater, Combustion Research Corp, M/N 0900NG	0.11
HVAC, Trane, M/N YCH300B4HOGA	0.40
HVAC, Trane, M/N YCH108B4HOFA	0.40
HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Trane, M/N 2TXC0061AC3HCAA	0.40
HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Carrier, M/N 48TJE016	0.40
HVAC, Bryant, M/N 580DPV090180ABAA	0.40
HV, Reznor, M/N EEXL225	0.23
HV, Reznor, M/N XL200	0.20
HV, Reznor, M/N F200	0.20
HV, Dayton, M/N 3E230B	0.40
Total (41 units)	11.03

- (c) Various welding operations, including four (4) semi-automatic TIG welders, eleven (11) TIG line welder, four (4) TIG welding stations, and three (3) MIG welding stations. Maximum electrode usage is 1 pound per hour each for MIG and TIG operations. All welding operations are controlled with various dust collectors.

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

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

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

Pursuant to 326 IAC 6.5-1-2, particulate emissions from the forty-one (41) gas fired combustion units (EU10) and the welding operations shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

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

Source Name: Aerofab, Division of Tube Processing Corporation
Source Address: 604 East LeGrande Avenue, Indianapolis, Indiana 46203
FESOP Permit No.: F097-30090-00011

**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: Aerofab, Division of Tube Processing Corporation
Source Address: 604 East LeGrande Avenue, Indianapolis, Indiana 46203
FESOP Permit No.: F097-30090-00011

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Aerofab, Division of Tube Processing Corporation
 Source Address: 604 East LeGrande Avenue, Indianapolis, Indiana 46203
 FESOP Permit No.: F097-30090-00011

Months: _____ **to** _____ **Year:** _____

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”.	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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:	

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

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	Aerofab, Division of Tube Processing Corporation
Source Location:	604 East LeGrande Avenue, Indianapolis, IN 46203
County:	Marion (Center Township)
SIC Code:	3498 (Fabricated Pipe and Pipe Fittings) 3444 (Sheet Metal Work)
Operation Permit No.:	F 097-30090-00011
Operation Permit Issuance Date:	June 6, 2011
Significant Permit Revision No.:	097-33030-00011
Permit Reviewer:	Tamera Wessel

On April 1, 2013, the Office of Air Quality (OAQ) received an application from Aerofab, Division of Tube Processing Corporation (Aerofab) related to a modification to an existing stationary steel tubing/fabrication repair plant. Additional information was received on June 14th and July 1, 2013.

Existing Approvals

Since the issuance of the FESOP No. 097-30090-00011 on June 6, 2011, the source has been operating under the following additional approvals:

- (a) Significant Permit Modification No. 097-31173-00011 issued on March 20, 2012.

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.

County Attainment Status

The source is located in Marion County, in Center Township.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

¹Attainment 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

Pollutant	Designation
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} and SO₂, 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 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.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, as determined from permit No. FESOP 097-31173-00011, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Spray Paint Booth EU1	0.05	0.05	0.05	0.00	0.00	2.10	0.00	0.00	0.00	0.00
Thermal Paint Booths (EU-2, EU-3, EU-4, EU-11, EU-12, EU-13, and EU-14)	240.00	90.00	90.00	0.00	0.00	0.00	0.00	0.00	3.27	1.28 (Nickel)
Toluene Pretreatment EU-5	0.00	0.00	0.00	0.00	0.00	2.08	0.00	0.00	1.93	1.93 (Toluene)
Titanium Etching EU-7	0.00	0.00	0.00	0.00	5.04	0.00	0.00	0.00	0.00	0.00

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Laser Cutting EU-9	0.58	0.58	0.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00
41 Gas-Fired Combustion EU10	0.09	0.37	0.37	0.03	4.54	0.27	1.93	5824.72	0.09	0.09 (Hexane)
Welding	0.053	0.053	0.053	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	240.77	91.05	91.05	0.03	9.57	4.45	1.93	5824.72	<25	<10
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	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".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are 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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Aerofab on April 1, 2013, relating to a revision of its FESOP. Additional information was received on June 14th and July 1, 2013. The source has requested to add two thermal spray coating units to its operation, identical to seven other thermal spray coating units. The source would also like to add an additional clean-up operation to the permit as they would like to include Isopropyl Alcohol, which contributes VOC emissions, as an optional solvent to the current Acetone solvent, which contains no HAPs or VOC.

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

- (a) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU15 and EU16, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit dust collector, identified as DC2, and exhausting through vent S8.

- (b) One (1) cleanup operation utilizing acetone and isopropyl alcohol as solvents and a maximum usage rate of 0.27 gallons per hour.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Thermal Paint Booth EU-15	51.47	51.47	51.47	0.00	0.00	0.00	0.00	0.00	46.68	18.28 (Nickel)
Thermal Paint Booth EU-16	51.47	51.47	51.47	0.00	0.00	0.00	0.00	0.00	46.68	18.28 (Nickel)
Cleanup Operations	-	-	-	-	-	7.85	-	-	-	-
Total PTE of Proposed Revision	102.94	102.94	102.94	0.00	0.00	7.85	0.00	0.00	93.36	36.56

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f), because the revision involves the construction of Thermal Spray Paint Booths, EU-15 and EU-16, with the potential to emit (PTE) greater than 25 tons per year. In addition, this is a significant permit revision pursuant to 326 IAC 2-8-11.1(g) because the existing source-wide emissions limitations will be adjusted to maintain the FESOP status of the source (see PTE of the Entire Source After Issuance of the FESOP Revision Section).

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source, reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Spray Paint Booth EU1	0.05	0.05	0.05	0.00	0.00	2.10	0.00	0.00	0.00	0.00
Thermal Paint Booth (EU-2)/2101	27.00	10.00	10.00	0.00	0.00	0.00	0.00	0.00	2.50	0.83 (Nickel)
Thermal Paint Booths (EU-2, EU-3, EU-4, EU-11, EU-12, EU-13, and EU-14)/2100	240.00 53.92	90.00 20.00	90.00 20.00	0.00	0.00	0.00	0.00	0.00	3.27 4.99	1.28 1.66 (Nickel)
Thermal Paint Booths (EU-4 and EU-11)/2102	53.92	20.00	20.00	0.00	0.00	0.00	0.00	0.00	4.99	1.66 (Nickel)
Thermal Paint Booths (EU-13 and EU-14)/2156	53.92	20.00	20.00	0.00	0.00	0.00	0.00	0.00	4.99	1.66 (Nickel)
Thermal Paint Booths (EU-15 and EU-16)/DC2	53.92	20.00	20.00	0.00	0.00	0.00	0.00	0.00	4.99	1.66 (Nickel)
Toluene Pretreatment EU-5	0.00	0.00	0.00	0.00	0.00	2.08	0.00	0.00	1.93	1.93 (Toluene)
Titanium Etching EU-7	0.00	0.00	0.00	0.00	5.04	0.00	0.00	0.00	0.00	0.00
Laser Cutting EU-9	0.58	0.58	0.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00
41 Gas-Fired Combustion EU10	0.09	0.37	0.37	0.03	4.54	0.27	1.93	5824.72	0.09	0.09 (Hexane)
Welding	0.053	0.053	0.053	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cleanup Operations	0.00	0.00	0.00	0.00	0.00	7.85	0.00	0.00	0.00	0.00
Total PTE of Entire Source	240.77 243.45	91.05	91.05	0.03	9.57	4.45 12.29	1.93	5824.72	24.48 <25	<10
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
41 Gas-Fired Combustion EU10	0.09	0.37	0.37	0.03	4.54	0.27	1.93	5824.72	0.09	0.09 (Hexane)
Welding	0.053	0.053	0.053	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cleanup Operations	0.00	0.00	0.00	0.00	0.00	7.85	0.00	0.00	0.00	0.00
Total PTE of Entire Source	243.45	91.05	91.05	0.03	9.57	12.29	1.93	5824.72	24.48	<10
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	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".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be 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:

- (1) Combined HAP emission limit for Torit Dust Collectors 2100, 2102, 2156 and DC-2 shall not exceed 1.14 pounds per hour for each of the dust collectors 2100, 2102, 2156, and DC-2.
- (2) Combined HAP emission limit for Torit Dust Collector 2101 shall not exceed 0.57 pounds per hour for the dust collector 2101.
- (3) Single HAP emissions of cobalt, chromium, and nickel shall not exceed 0.38 pounds for each HAP per hour for each of the Torit Dust Collectors 2100, 2102, 2156, and DC-2.
- (7) Single HAP emissions of cobalt, chromium, and nickel shall not exceed 0.19 pounds for each HAP per hour for dust collector 2101.
- (5) PM10 and PM2.5 emission limits for Torit Dust Collectors 2100, 2102, 2156, and DC-2 are 4.56 pounds per hour for each of the dust collectors 2100, 2102, 2156, and DC-2.
- (6) PM10 and PM2.5 emission limits for Torit Dust Collector DC-2 are 2.28 pounds per hour for dust collector 2101.

Compliance with these limits, combined with the potential to emit PM₁₀, PM_{2.5} and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM₁₀ and PM_{2.5} to less than 100 tons per 12 consecutive month period, each, 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), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

These are existing requirements modified to include Torit Dust Collector DC-2.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM is limited to less than 250 tons per year and the potential to emit all other attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall continue to comply with the following:

- (1) PM emission limits for Torit Dust Collectors 2100, 2102, 2156, and DC-2 shall not exceed 12.31 pounds per hour for each of the dust collectors 2100, 2102, 2156, and DC-2.
- (2) PM emission limits for Torit Dust Collector 2101 shall not exceed 6.16 pounds per hour for the dust collector 2101.

Compliance with this limitation, combined with the potential to emit PM from other emission units at this source, shall limit the source-wide PTE of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirement of 326 IAC 2-2 not applicable.

This is an existing requirement modified to include Torit Dust Collector DC-2.

(c) Emission Offset Minor Source

This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since all of the natural gas-fired units have a maximum heat input capacity of less than the threshold of 10 MMBtu per hour.
- (b) The requirements of the New Source Performance Standard for Standards of Performance for Surface Coating of Metal Furniture 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source does not coat furniture.
- (c) The requirements of the New Source Performance Standard for Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source only coats aerospace equipment.

- (d) The requirements of the New Source Performance Standard for Standards of Performance for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (326 IAC 12), are not included in the permit, since this source does not coat coil.
- (e) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63.111, Subpart HHHHHH), are not included in the permit because this subpart applies to spray application of coatings and for the purposes of this subpart, the thermal spray coating booths are not included in the definition of spray-applied coating operations.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11, Subpart XXXXXX, are not included in the permit because the source's SIC codes (3444, 3498) are not included in the EPA source category list for the nine metal fabrication and finishing source categories. Although the source engages in welding operations emitting chromium, it does not qualify as one of the nine source categories, rendering this rule not applicable.
- (h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (i) 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.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not

apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

This modification to an existing minor stationary source under 326 IAC 2-1.1-5 (Nonattainment New Source Review) will not change the minor status, because the potential to emit of PM_{2.5} from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the new spray booth is greater than ten (10) tons per year for any single HAP and/or 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 new unit 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. Therefore, the proposed revision is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of 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.

These requirements apply pursuant to 326 IAC 5-1-1(a)(5) because the source is located in Marion County, not in the area of Washington Township east of Fall Creek nor the area of Franklin Township south of Thompson Road and east of Five Points Road. The source is located in Center Township.

- (g) 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.

Thermal Spray Booths EU15 and EU16

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to 326 IAC 6-3-2, because 326 IAC 6.5-1-2 applies.
- (i) 326 IAC 6.5 PM (Limitations Except Lake County)
This source is subject to 326 IAC 6.5 because it is located in Marion County, its PM PTE (or limited PM PTE) is equal to or greater than 100 tons/year or actual emissions are greater than 10 tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2

through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2(a) applies. PM emissions shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf))

- (j) 326 IAC 8-2 (Surface Coating and Graphic Arts)
The source is located in Marion County and thermal spray booths EU15 and EU16, approved for construction in 2013, perform a metal coating process and the source is under the SIC major group 34. However, the thermal spray booths EU15 and EU16 do not use a VOC coating. Therefore, the thermal spray booths are not subject to 326 IAC 8-2-9.
- (k) 326 IAC 8-17 (Industrial Solvent Cleaning Operations)
The source is located in Marion County and uses a cleaning solvent containing VOC. However, 326 IAC 8-17 only applies to industries located in Lake and Porter Counties. Therefore, the cleanup operation is not subject to 326 IAC 8-17
- (l) There are no other 326 IAC 8 rules that apply.
- (m) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: 097-31173-00011, issued on March 20, 2012.

Compliance Determination, Monitoring and Testing Requirements

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

Emission Unit/Control	Operating Parameters	Frequency
Torit Dust Collectors /2100, 2101, 2102, 2156, and DC2	Pressure Drop	Once per day
Torit Dust Collectors /2100, 2101, 2102, 2156, and DC2	Visible Emissions	Once per day

- (b) In order to comply with the single HAP allowable limit, the baghouse must achieve a control efficiency greater than 90%. Therefore, the source must perform stack testing to verify compliance with 326 2-8 (FESOP).

This is a new requirement.

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Paint Booth EU2	Torit Dust Collector 2101	Chromium, Cobalt, and Nickel	No later than 180 days after initial start-up of the thermal spray coating booths with baghouse.	Once every five (5) years on either Torit dust collector 2100, 2101, 2102, 2156, or DC2. The source will test the baghouse for which the longest period of time has passed since the last valid compliance test.
Paint Booths EU3 and EU12	Torit Dust Collector 2100			
Paint Booths EU4 and EU11	Torit Dust Collector 2102			
Paint Booths EU13 and EU14	Torit Dust Collector 2156			
Thermal spray coating Booths EU15 and EU16	Torit Dust Collector DC2			

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

Modification No. 1:

Sections A.2, and D.1 are being revised to include the new thermal spray booths, EU15 and EU16, the cleaning operation, and to correct the description of the existing thermal spray coating booths that are shown to be controlled by one Torit Dust Collector when there are actually four dust collectors controlling the existing thermal spray booths.

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:

- (a) ---
- (b) ~~Seven (7)~~ **One (1)** thermal spray coating booths, applying powder coatings to metal parts, identified as EU2, ~~EU3, and EU4~~, constructed in 1987, ~~and EU11 and EU12, constructed in 2009, EU13 approved for construction in 2011, and EU14 approved for construction in 2012~~, with a maximum coating capacity of 23.8 pounds of metal powder per hour; ~~each~~; utilizing a Torit Dust Collector, identified as ~~DC1~~ **2101**, as particulate control **and exhausting through vent S2.**

~~EU2 exhausts to 2101 through vent S2.
EU3 and EU12 exhaust to DC1 through vent S3.
EU4 and EU11 exhaust to DC1 through vent S6
EU13 and EU14 exhausts to DC1 through vent S7.~~

~~Under 40 CFR 63, Subpart HHHHHH, these are affected units.~~

- (c) **Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.**
- (d) **Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.**
- (e) **Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.**
- (f) **Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU15 and EU16, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.**

- (g) **One (1) cleanup operation, approved for modification in 2013 utilizing acetone and isopropyl alcohol as solvents and a maximum usage rate of 0.27 gallons per hour.**

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) enclosed paint booth, constructed in 2002, used to apply coatings to a limited quantity of small aviation components, identified as EU1, with a maximum capacity to paint approximately 268 aerospace components of various types per month. EU1 uses dry filters, DF1, as control equipment, and exhausts to S1.

(b) ~~Seven~~**One (1)** thermal spray coating booths, applying powder coatings to metal parts, identified as EU2, EU3, and EU4, constructed in 1987, and EU11 and EU12, constructed in 2009, EU13 approved for construction in 2011, and EU14 approved for construction in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour; ~~each;~~ utilizing a Torit Dust Collector, identified as ~~DC4~~**2101**, as particulate control **and exhausting through vent S2.**

~~EU2 exhausts to DC1 through vent S2.~~

~~EU3 and EU12 exhaust to DC1 through vent S3.~~

~~EU4 and EU11 exhaust to DC1 through vent S6~~

~~EU13 and EU14 exhaust to DC1 through vent S7.~~

~~Under 40 CFR 63, Subpart HHHHHH, these are affected units.~~

(c) **Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.**

(d) **Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.**

(e) **Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.**

(f) **Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU15 and EU16, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.**

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

Modification No. 2:

Section D.1 is being revised to include the adjustments made to the limits for HAPs, PM, PM10, and PM2.5 due to the new thermal spray booths, EU15 and EU16, and the existing dust collectors that were not listed previously.

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

D.1.1 Hazardous Air Pollutants (HAP) Limitations [326 IAC 2-4.1] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-4.1 (MACT) not applicable, the hazardous air pollutants emissions from the Torit Dust Collectors (~~DC12100, 2101, 2102, 2156 and DC2~~) shall be limited as follows:

- (a) The total input ~~emission~~ of any single HAP shall not exceed the following:

HAP	Emission Limit (lb/hr)				
	DC12100	2101	2102	2156	DC2
Cobalt	2.05 0.38	0.19	0.38	0.38	0.38
Chromium	2.05 0.38	0.19	0.38	0.38	0.38
Nickel	2.05 0.38	0.19	0.38	0.38	0.38

- (b) The total emissions of any combination of HAPs shall not exceed ~~5.25~~**1.14** pounds per hour ~~for 2100.~~
- (c) **The total emissions of any combination of HAPs shall not exceed 0.57 pounds per hour for 2101.**
- (d) **The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for 2102.**
- (e) **The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for 2156.**
- (f) **The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for DC2.**

Compliance with these limits, combined with the potential to emit of HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of 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 2-4.1 (MACT) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 FESOP Limitations [326 IAC 2-8-4] [326 IAC 2-1.1-5]

- (a) Pursuant to 326 IAC 2-8-4 (FESOP), PM10 emissions from Torit Dust Collectors (~~DC12100, 2101, 2102, 2156 and DC2~~) shall not exceed ~~20.30 pounds per hour.~~ **the following:**

PM10 Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
4.56	2.28	4.56	4.56	4.56

- (b) Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, PM2.5 emissions for **the** Torit

Dust Collectors (~~DC~~**2100, 2101, 2102, 2156 and DC2**) shall not exceed ~~20.30 pounds per hour.~~ **the following:**

PM2.5 Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
4.56	2.28	4.56	4.56	4.56

Compliance with these limitations, combined with the potential to emit PM10 and PM2.5 from other emission units at this source, shall limit the source-wide PTE of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

D.1.3 Particulate Matter (PM) PSD Minor Limits [326 IAC 2-2]

In order to render the 326 IAC 2-2 (PSD) requirements not applicable, particulate matter (PM) emissions from **the Torit Dust Collectors (~~DC~~**2100, 2101, 2102, 2156 and DC2**)** shall not exceed ~~54.79 pounds per hour.~~ **the following:**

PM Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
12.31	6.16	12.31	12.31	12.31

Compliance with this limitation, combined with the potential to emit PM from other emission units at this source, shall limit the source-wide PTE of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirement of 326 IAC 2-2 not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, particulate emissions from the enclosed paint booth ((EU1) and the ~~seven~~ **nine (79)** thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, ~~and~~ EU14, **EU15 and EU16**), shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 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 the enclosed paint booth ((EU1), the ~~seven~~ **nine (79)** thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, ~~and~~ EU14, **EU 15 and EU16**) and their control devices, identified as DF1, ~~and~~ **DC**~~2100, 2101, 2102, 2156 and DC2. 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 Particulate Control

- (a) In order to comply with Conditions D.1.1, D.1.2, D.1.3, and D.1.4 the Torit Dust Collectors, identified as ~~DC~~**2100, 2101, 2102, 2156 and DC2**, shall be in operation and control emissions at all times the thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, ~~and~~ EU14, **EU15 and EU16**) are in operation.

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

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the Torit Dust Collectors, identified as ~~DC~~**2100, 2101, 2102, 2156 and DC2**, exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

D.1.8 Parametric Monitoring

The Permittee shall record the pressure drops across **the** Torit Dust Collectors, identified as ~~DC12100, 2101, 2102, 2156 and DC2~~, used in conjunction with thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, ~~and~~EU14, **EU15 and EU16**), at least once per day when any thermal spray coating booth is in operation. When for any one reading, the pressure drop across **the any** Torit Dust Collector is outside the normal range of 1.0 to 6.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take reasonable steps shall be considered a deviation from this permit.

D.1.10 Testing Requirements [326 IAC 2-8-5] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform chromium, cobalt and nickel testing for the thermal spray paint booths baghouse DC2, no later than one hundred eighty (180) days after initial startup of the 2 thermal spray coating booths controlled by baghouse DC2, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration, on either Torit dust collector 2100, 2101, 2102, 2156, or DC2. The source will test the baghouse for which the longest period of time has passed since the last valid compliance test. 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.

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

D.1.101 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the visible emission notations of the Torit Dust Collectors (~~DC12100, 2101, 2102, 2156 and DC2~~) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the pressure drop across the Torit Dust Collectors (~~DC12100, 2101, 2102, 2156 and DC2~~) controlling the thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, ~~and~~ EU14, **EU15 and EU16**). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

Modification No. 3:

Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63.111, Subpart HHHHHH) apply to spray application of coatings containing target HAPs. For the purposes of this subpart, thermal spray operations are

not included in the definition of spray-applied coatings as specified in 40 CFR 63.11180.
Therefore the source is not subject to 40 CFR 63, Subpart HHHHHH.

SECTION E.1 — EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) Six (6) thermal spray coating booths, applying powder coatings to metal parts, identified as EU2, EU3, and EU4, constructed in 1987, and EU11 and EU12, constructed in 2009, and EU13 approved for construction in 2011, and EU14, approved for construction in 2014, with a combined maximum coating capacity of 23.8 pounds per hour, each; utilizing a Torit Dust Collector, identified as DC1, as particulate control.
EU2 exhausts to DC1 through vent S2.
EU3 and EU12 exhaust to DC1 through vent S3.
EU4 and EU11 exhaust to DC1 through vent S6
EU13 and EU14 exhaust to DC1 through vent S7.

Under 40 CFR 63, Subpart HHHHHH, these are affected units.

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

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

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.

E.1.2 Paint Stripping and Miscellaneous Surface Coating at Area Sources NESHAP [40 CFR 63, Subpart HHHHHH] [326 IAC 20-1-4]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart HHHHHH as specified in Attachment A of this permit:

- (1) 40 CFR 63.11169 (c)
- (2) 40 CFR 63.11170 (a)(3)
- (3) 40 CFR 63.11170 (b)
- (4) 40 CFR 63.11171 (a)-(b)(5)
- (5) 40 CFR 63.11171 (e)
- (6) 40 CFR 63.11172 (b)
- (7) 40 CFR 63.11173 (f)
- (8) 40 CFR 63.11174
- (9) 40 CFR 63.11175 (a)(1)-(5)(i), (7), (8)(b)(1)-(3)
- (10) 40 CFR 63.11176 (a)
- (11) 40 CFR 63.11177 (a)
- (12) 40 CFR 63.11177 (c)-(d)
- (13) 40 CFR 63.11177 (g)-(h)
- (14) 40 CFR 63.11178
- (15) 40 CFR 63.11179
- (16) 40 CFR 63.11180

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 1, 2013 and additional information was received on June 14th and July 1, 2013

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 097-33030-00011. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jack Harmon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4228 or toll free at 1-800-451-6027 extension 3-4228.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

Appendix A: Emission Calculations Summary

Summary After Revision

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-33030-00011
Plt ID: 097-00011
Reviewer: Tamera Wessel
Date: April 1, 2013

Uncontrolled Potential Emissions (tons/year)											
Emissions Units											
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG, as CO2e	Total HAP	Single HAP	HAP Name
Spray Paint booth/EU1	0.05	0.05	0.05	-	-	2.10	-		-	-	
Thermal Paint Booths (EU-2)/2101	51.47	51.47	51.47	-	-	-	-		46.68	18.28	Nickel
Thermal Paint Booths (EU-3, EU-12) /2100	102.93	102.93	102.93						93.36	36.56	Nickel
Thermal Paint Booths (EU-4, EU-11) /2102	102.93	102.93	102.93						93.36	36.56	Nickel
Thermal Paint Booths (EU-13, EU-14) /2156	102.93	102.93	102.93						93.36	36.56	Nickel
Thermal Paint Booths (EU-15, EU-16) /DC2	102.93	102.93	102.93	-	-	-	-		93.36	36.56	Nickel
Toluene Pretreatment/EU-5	-	-	-	-	-	2.08	-		1.93	1.93	Toluene
Titanium Etching/EU-7	-	-	-	-	5.04	-	-		-	-	
Laser Cutting/EU-9	0.58	0.58	0.58	-	-	-	-		-	-	
41 Gas-Fired Combustion/EU10	0.09	0.37	0.37	0.03	4.54	0.27	1.93	5824.72	0.09	0.09	Hexane
Welding	0.05	0.03	0.00	-	-	-	-		0.002	0.002	Manganese
Cleanup	-	-	-	-	-	7.85	-		-	-	
Totals	463.96	464.21	464.18	0.03	9.57	12.29	1.93	5824.72	422.12	164.50	Nickel

Limited Emissions (tons/year)											
Emissions Units											
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG, as CO2e	Total HAP	Single HAP	HAP Name
Spray Paint booth/EU1	0.05	0.05	0.05	-	-	2.10	-	-	-	-	
Thermal Paint Booths (EU-2) /2101	27.00	10.00	10.00						2.50	0.83	
Thermal Paint Booths (EU-3, EU-12) /2100	53.92	20.00	20.00						4.99	1.66	
Thermal Paint Booths (EU-4, EU-11) /2102	53.92	20.00	20.00						4.99	1.66	
Thermal Paint Booths (EU-13, EU-14) /2156	53.92	20.00	20.00	-	-	-	-	-	4.99	1.66	Nickel
Thermal Paint Booths (EU-15, EU-16) /DC2	53.92	20.00	20.00					-	4.99	1.66	Nickel
Toluene Pretreatment/EU-5	-	-	-	-	-	2.08	-	-	1.93	1.93	Toluene
Titanium Etching/EU-7	-	-	-	-	5.04	-	-	-	-	-	
Laser Cutting/EU-9	0.58	0.58	0.58	-	-	-	-	-	-	-	
41 Gas-Fired Combustion/EU10	0.09	0.37	0.37	0.03	4.54	0.27	1.93	5824.72	0.09	0.09	Hexane
Welding	0.053	0.053	0.053	-	-	-	-	-	0.002	0.002	
Cleanup	-	-	-	-	-	7.85	-	-	-	-	
Totals	243.45	91.05	91.05	0.03	9.57	12.29	1.93	5824.72	24.48	<10	

Appendix A: Emission Calculations Summary

Revision Summary

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-33030-00011
Plt ID: 097-00011
Reviewer: Tamera Wessel
Date: April 1, 2013

New Booths EU15 & EU16

Uncontrolled Potential Emissions (tons/year)											
Emissions Units											
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG, as CO2e	Total HAP	Single HAP	HAP Name
Thermal Paint Booth (EU-15)	51.47	51.47	51.47	0.00	0.00	0.00	0.0	0.0	46.68	18.28	Nickel
Thermal Paint Booth (EU-16)	51.47	51.47	51.47	0.00	0.00	0.00	0.0	0.0	46.68	18.28	Nickel
Totals	102.93	102.93	102.93	0.00	0.00	0.00	0.00	0.00	93.36	36.56	Nickel

Thermal Spray Booths EU-15 and EU-16, added in Significant Revision 097-33030-00011, in 2013, and identical to the other seven (7) units.

**Appendix A: Emission Calculations
Spray Paint Booth**

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-33030-00011
Plt ID: 097-00011
Reviewer: Tamera Wessel
Date: April 1, 2013

Product	Maximum Capacity (unit/hr)	Application (gal/unit)	Density (lbs/gal)	Volatile Weight (%)	Non-Volatile Solids Volume (%)	Emission Rate (lbs/hr)	VOC Potential (tpy)	PM Potential (tpy)	Transfer Efficiency
Sermetel W	0.367	0.0230	13.74	63.0%	37.0%	0.0731	0.3200	0.0470	75%
Thinner IP 9151	0.367	0.1400	7.90	100.0%	0.0%	0.4059	1.7779	0.0000	75%

TOTAL **2.0979** **0.0470**

Methodology

Maximum Capacity (unit/hr) = calculated from maximums supplied by client; 268 units per month x 12 months per year / 8,760 hours per year

Application (gal/unit) = supplied by client; based on how much product is applied to part

Density (lbs/gal) = as supplied by MSDS

Volatile Weight (%) = as supplied by MSDS

Non-Volatile Solids Volume (%) = as supplied by MSDS

Emission Rate (lbs/hr) = Maximum Capacity (unit/hr) x Application (gal/unit) x Density (lbs/gal) x Volatile Weight (%)

VOC Potential (tpy) = VOC Emissions (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

PM Potential (tpy) = Maximum Capacity (unit/hr) x Application (gal/unit) x Density (lbs/gal) x Non-Volatile Solids Volume (%) x (1 - Transfer Efficiency) x 8,760 hours per year / 2,000 lbs per ton

Appendix A: Emission Calculations
Thermal Spray Booths (EU-2, EU-3, EU-4, EU-11, EU-12, EU-13, EU-14, EU-15, and EU-16)

Appendix A: Emission Calculations Summary

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-33030-00011
Plt ID: 097-00011
Reviewer: Tamera Wessel
Date: April 1, 2013

/ISED TO ADD EU-15 and EU-16
 (new total of 9 identical units)

Product (Powder) Name	Max. Throughput (lbs/hr)	Transfer Efficiency of Application Equipment (%)	Material Dropout Rate* (%)	PM Emission Rate (lbs/hr)	PM Potential (tpy)	Control Efficiency (%)	Controlled PM Emission Rate (lbs/hr)	controlled PM Potential (tpy)
CO-103	6.0	50%	0%	3.00	13.14	99%	0.03	0.13
443NS	8.6	50%	0%	4.30	18.83	99%	0.04	0.19
CRC-108	2.9	50%	0%	1.45	6.35	99%	0.01	0.06
CO-308-4	6.0	50%	0%	3.00	13.14	99%	0.03	0.13
Total for one booth				11.75	51.47		0.12	0.51
Total for nine booths				105.75	463.19		1.06	4.63

Product (Powder) Name	Cobalt Content (wt%)	Chromium Content (wt%)	Manganese Content (wt%)	Nickel Content (wt%)	Cobalt Potential (tpy)	Chromium Potential (tpy)	Manganese Potential (tpy)	Nickel Potential (tpy)	Controlled Cobalt Potential (tpy)	Controlled Chromium Potential (tpy)	Controlled Manganese Potential (tpy)	Controlled Nickel Potential (tpy)
CO-103	56.5%	25.5%	0.0%	10.5%	7.42	3.35	0.00	1.38	0.07	0.03	0.00	0.01
443NS	0.0%	18.0%	0.0%	76.0%	0.00	3.39	0.00	14.31	0.00	0.03	0.00	0.14
CRC-108	0.0%	70.0%	0.0%	20.0%	0.00	4.45	0.00	1.27	0.00	0.04	0.00	0.01
CO-308-4	53.0%	20.0%	1.5%	10.0%	6.96	2.63	0.20	1.31	0.07	0.03	0.00	0.01
Total for one booth					14.39	13.81	0.20	18.28	0.14	0.14	1.97E-03	0.18
Total for EU15 and EU16					28.78	27.63	0.39	36.56	0.29	0.28	3.94E-03	0.37
Total for nine booths					129.49	124.33	1.77	164.50	1.29	1.24	0.02	1.64

* In some cases, Material Dropout rate (30-40%) is taken into consideration when calculating thermal spray coating booths emissions. However, there is no reliable data related to Dropout rates at this source; therefore, the Dropout rate is conservatively assumed to be 0%.

Methodology

Products selected were the worst-case scenario products in terms of highest HAP concentration and throughput.

Max. Throughput (lbs/hr) = supplied by client

Transfer Efficiency of Application Equipment (%) = average used by IDEM in previous permits; % of product retained on part

Material Dropout Rate (%) = IDEM was unable to find reliable data related to Dropout rates at client and thus a conservative assumption was used;

Cornerstone did not find any data that could accurately say otherwise.

PM Emission Rate (lbs/hr) = Max. Throughput (lbs/hr) x Transfer Efficiency of Application Equipment (%) x (1 - Material Dropout Rate [%])

PM Potential (tpy) = PM Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

Controlled PM Emission Rate (lbs/hr) = Max. Throughput (lbs/hr) x Transfer Efficiency of Application Equipment (%) x (1 - Material Dropout Rate [%]) * (1-Control Efficiency [%])

Controlled PM Potential (tpy) = controlled PM Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

[HAP] Content (wt%) = supplied by source

[HAP] Potential (tpy) = PM emission Rate (lbs/hr) x [HAP] Content (wt%) x 8,760 hours per year / 2,000 lbs per ton

[HAP] controlled Potential (tpy) = PM emission Rate (lbs/hr) x [HAP] Content (wt%) x 8,760 hours per year / 2,000 lbs per ton

PM=PM10=PM2.5

Total HAPs	46.68	each unit before limit/control
Total HAPs	420.10	total 9 units before limit/control
Total HAPs	0.93	total EU15 & EU 16 after control
Total HAPs	4.20	total 9 units after control

**Appendix A: Emission Calculations
Toluene Pretreatment/EU-5**

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-33030-00011
Plt ID: 097-00011
Reviewer: Tamera Wessel
Date: April 1, 2013

Product	Maximum Usage Rate (gal/hr)	VOC Content (lbs/gal)	Emission Rate (lbs/hr)	VOC Potential (tpy)
Turco Pretreatment	0.07	6.78	0.47	2.08

HAP	Density (lbs/gal)	HAP Weight (%)	Emission Rate (lbs/hr)	HAP Potential (tpy)
Toluene	7.41	85.0%	0.44	1.93

Methodology

Maximum Usage Rate (gal/hr) = supplied by client

Density (lbs/gal) = as supplied by MSDS

VOC Content (lbs/gal) = as supplied by MSDS

Emission Rate (lbs/hr) = Maximum Usage Rate (gal/hr) x [Pollutant] Content (lbs/gal)

[Pollutant] Potential (tpy) = Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

**Appendix A: Emission Calculations
Titanium Etching EU-7**

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-33030-00011
Plt ID: 097-00011
Reviewer: Tamera Wessel
Date: April 1, 2013

Product	Maximum Usage (gal/yr)	Density (lbs/gal)	Solution of Nitric Acid (%)	Mole Ratio (NO ₂ /HNO ₃)	Emission Rate (lbs/yr)	NO _x Potential (tpy)
Nitric Acid	1555	12.33	72.0%	0.73	10077.41	5.04

Methodology

Maximum Usage (gal/yr) = supplied by client

Density (lbs/gal) = as supplied by MSDS

Solution of Nitric Acid (%) = Maximum solution of Nitric Acid purchased by client (varies between 68 - 72%)

Mole Ratio (NO₂/HNO₃) = Ratio of Moles Nitrogen Dioxide (NO₂) to Moles Nitric Acid (HNO₃) chemically reactive

Emission Rate (lbs/yr) = Maximum Usage (gal/yr) x Density (lbs/gal) x Solution of Nitric Acid (%) x Mole Ratio (NO₂/HNO₃)

NO_x Potential (tpy) = Emission Rate (lbs/yr) / 2,000 lbs per ton

**Appendix A: Emission Calculations
Laser Cutting (EU-9)**

Appendix A: Emission Calculations Summary

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-33030-00011
Plt ID: 097-00011
Reviewer: Tamera Wessel
Date: April 1, 2013

Amount of Dust Collected in 1999	950 lbs/year	0.108 lbs/hr
Estimated Actual Operating Hours in 1999	7200 hours/year	
Estimated Baghouse Capture Efficiency	100%	
Estimated Baghouse Control Efficiency	99%	
PM Emissions Before Control	960 lbs/year	
Potential PM Emissions Generated (Scaled up to 8760)	1,168 lbs/year	
	0.584 tons/year	
	or: 0.133 lb/hr	

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

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-33030-00011
Plt ID: 097-00011
Reviewer: Tamera Wessel
Date: April 1, 2013

Heat Input MMBtu/hr	Potential MMCF/yr	Unit Description
5.76	50.46	Radiant Heaters, Combustion Research Corp, M/N 0600NG (24 @ 0.24 MMBtu/hr each)
0.13	1.14	Radiant Heater, Combustion Research Corp, M/N 0800NG
0.4	3.50	Radiant Heaters, Combustion Research Corp, M/N 0845NG (2 @ 0.20 MMBtu/hr each)
0.1	0.88	Radiant Heater, Combustion Reasearch Corp, M/N 0900NG
0.4	3.50	HVAC, Trane, M/N YCH300B4HOGA
0.4	3.50	HVAC, Trane, M/N YCH108B4HOFA
0.80	7.01	HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)
0.40	3.50	HVAC, Trane, M/N 2TXC0061AC3HCAA
0.80	7.01	HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)
0.40	3.50	HVAC, Carrier, M/N 48TJE016
0.40	3.50	HVAC, Bryant, M/N 580DPV090180ABAA
0.23	1.97	HV, Reznor, M/N EEEXL225
0.20	1.75	HV, Reznor, M/N XL200
0.20	1.75	HV, Reznor, M/N F200
0.40	3.50	HV, Dayton, M/N 3E230B

11.02	96.49
-------	-------

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	94	5.5	40
				**see below		
Potential Emission in tons/yr	0.09	0.37	0.03	4.54	0.27	1.93

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 9 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-31173-00011
Plt ID: 097-00011
Reviewer: Jack Harmon
Date: 2012

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.013E-04	5.789E-05	3.618E-03	8.684E-02	1.640E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.412E-05	5.307E-05	6.754E-05	1.833E-05	1.013E-04

Methodology is the same as page 7.

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

Greenhouse Gas			
Emission Factor in lb/MMcf	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	5,789	0.1	0.1
Summed Potential Emissions in tons/yr	5,790		
CO2e Total in tons/yr	5,825		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission Calculations
Welding Operations**

Appendix A: Emission Calculations Summary

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-33030-00011
Plt ID: 097-00011
Reviewer: Tamera Wessel
Date: April 1, 2013

Various welding operations, including 4 semi-automatic TIG welders, 1 TIG line welder, 11 TIG welding stations, and 4 MIG welding stations. The 4 MIG welding stations have a combined maximum capacity to use 1 pound of electrode per hour. All welding operations are controlled with various dust collectors.

Potential Emissions Calculation

Type of Welding	MIG	TIG
Type of Electrode/Consumable	ER70S-3	N/D
Maximum Electrode Usage [lb/hr] ⁽¹⁾ =	1	1
Percent of Electrode Converted to Fume [%] ⁽²⁾ =	0.6%	0.6%
Percent of Manganese in Fume [%] ⁽²⁾ =	7.7%	N/A
Potential PM/PM ₁₀ Emissions [lb/hr] ⁽³⁾ =	0.006	0.006
Potential Manganese Emissions [lb/hr] ⁽⁴⁾ =	0.0005	N/A
Potential PM/PM₁₀ Emissions [tpy] ⁽⁵⁾ =	0.026	0.026
Potential Manganese Emissions [tpy] ⁽⁶⁾ =	0.002	N/A

Methodology

(1) MIG: Maximum Electrode Usage [lb/hr] = Maximum Electrode Usage (2,000 lb every 3 mo x 4) / 8,760 hr/yr

Assumed TIG maximum electrode usage to be the same as MIG.

(2) Percent of electrode converted to fume and percent of manganese in fume were obtained from the "Guide for Estimating Welding Emissions for EPA and Ventilation Permit Reporting" published by the American Welding Society. Used factors for ER70S-3. Assumed that TIG welding produces the same amount of fume as MIG welding.

(3) Potential PM/PM₁₀ Emissions [lb/hr] = Maximum Electrode Usage [lb/hr] x Percent of Electrode Converted to Fume [%]

(4) Potential Manganese Emissions [lb/hr] = Potential PM/PM₁₀ Emissions [lb/hr] x Percent of Manganese in Fume [%]

(5) Potential PM/PM₁₀ Emissions [tpy] = Potential PM/PM₁₀ Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton

(6) Potential Manganese Emissions [tpy] = Potential Manganese Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton

Cleanup Operations

Potential Emissions Calculations

Material	Density (lbs/gal)	Maximum Usage (gal/hr)	Weight % Isopropyl Alcohol	HAP Content	Total PTE of HAPs (tons/yr)	Total PTE of VOC (tons/yr)
Isopropyl alcohol	6.56	0.2731164	100.00%	This solvent does not contain any HAPs	NA	7.85

Notes

Maximum usage (gal/hr) = Purchasing records for acetone (previous solvent) for 2012 * 1.5 safety factor to ensure worst-case scenario is represented/8760 hrs per year.

The facility will still use acetone for a small amount of the cleanup operations, however to represent worst-case scenario the calculations are based upon all cleanup utilizing isopropyl alcohol.

METHODOLOGY

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Usage (gal/hr) * (8,760 hr/yr) * (1 ton/2,000 lbs)



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

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

TO: Dan Seybert
Aerofab, Division of Tube Processing Corporation
604 E LeGrand Ave
Indianapolis, IN 46203-3907

DATE: August 21, 2013

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

SUBJECT: Final Decision
FESOP - Significant Permit Revision
097 - 33030 - 00011

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:
Ms. Andrea Swanson Cornerstone Environmental
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



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

August 21, 2013

TO: Indianapolis Marion Co. Pub. Lib. Garfield Branch

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

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

Applicant Name: Aerofab, Division of Tube Processing Corporation
Permit Number: 097 - 33030 - 00011

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 8/21/2013 Aero Fab Div of Tube Processing Corp. 097 - 33030 - 00011 /final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Dan Seybert Aero_Fab Div of Tube Processing Corp. 604 E LeGrand Ave Indianapolis IN 46203-3907 (Source CAATS) Via confirmed delivery										
2		Indianapolis Marion Co. Pub. Lib. Garfield Branch 2502 Shelby St. Indianapolis IN 46203 (Library)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)										
7		Ms. Andrea Swanson Cornerstone Environmental 880 Lennox Ct Zionsville IN 46077 (Consultant)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
---	--	--	--