



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

TO: Interested Parties / Applicant

DATE: July 17, 2013

RE: Best Equipment and Welding, Inc. / 097 - 33135 - 00713

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

## Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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  
FN-REGIS.dot 6/13/2013



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## REGISTRATION OFFICE OF AIR QUALITY

**Best Equipment & Welding, Inc.  
1960 Midwest Boulevard  
Indianapolis, Indiana 46214**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 097-33135-00713

Issued by:

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Issuance Date:

July 17, 2013

## SECTION A

## SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

### A.1 General Information

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The Registrant owns and operates a stationary operation engaged in the manufacture of architectural and ornamental metal products.

Source Address:	1960 Midwest Boulevard, Indianapolis, IN 46214
General Source Phone Number:	317-271-8652
SIC Code:	3446 (Architectural and Ornamental Metal Work)
County Location:	Marion County
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Registration

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) spray paint booth, identified as Paint Booth 1, constructed in 1997, using one (1) airless spray applicator to paint metal products, with a maximum coating usage of one (1) gallon of paint per hour, using dry filters as control, and exhausting to stack S1.
- (b) One (1) MIG welding operation, identified as Weld 1, constructed in 1993, with a maximum capacity of 3.75 pounds of electrode per hour, using no control and exhausting to the indoors.
- (c) One (1) metal cutting station using an aqueous cutting coolant, identified as Metal Cutting 1, constructed in 1993, using no control and exhausting to the indoors.

## SECTION B

## GENERAL CONDITIONS

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

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

### B.2 Effective Date of Registration [IC 13-15-5-3]

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Pursuant to IC 13-15-5-3, this registration 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.

### B.3 Registration Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

### B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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- (a) All terms and conditions of permits established prior to Registration No. 097-33135-00713 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 registration.

### B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

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Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

**B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]**

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Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

**B.7 Registrations [326 IAC 2-5.1-2(i)]**

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Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

**B.8 Preventive Maintenance Plan [326 IAC 1-6-3]**

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(a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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 Registrant 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 Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**

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

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 registration:

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

**C.2 Fugitive Dust Emissions [326 IAC 6-4]**

The Registrant 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).

## SECTION D.1

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) spray paint booth, identified as Paint Booth 1, constructed in 1997, using one (1) airless spray applicator to coat metal products, with a maximum coating usage of one (1) gallon of paint per hour, using dry filters as control, and exhausting to a stack identified as S1.
- (b) One (1) MIG welding operation, identified as Weld 1, constructed in 1993, with a maximum capacity of 3.75 pounds of electrode per hour, using no control and exhausting to the indoors.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

#### D.1.1 Particulate [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(h), Paint Booth 1 shall be controlled by a dry particulate filter, water wash, or an equivalent control device subject to the following:
  - (1) The Registrant shall operate the control device in accordance with manufacturer's specifications.
  - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after the observation:
    - (A) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
    - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (3) If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detectable at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
- (b) Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), particulate matter emissions from the one (1) MIG welding operation, identified as Weld 1, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

Pursuant to 326 IAC 8-2-9(c)(2) (Miscellaneous Metal and Plastic Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator for the spray paint booth, identified as Paint Booth 1, shall be limited to 3.5 pounds of VOC per gallon of coating less water.

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

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

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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

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A Preventive Maintenance Plan is required for the spray paint booth, identified as PB1, and its control device. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**

**D.1.5 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.1, the Registrant shall maintain a record of any actions taken if overspray is visibly detected.
- (b) Section C - General Record Keeping Requirements, of this permit contains the Registrant's obligations with regard to the records required by this condition.

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

**REGISTRATION  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	<b>Best Equipment &amp; Welding, Inc.</b>
<b>Address:</b>	<b>1960 Midwest Boulevard</b>
<b>City:</b>	<b>Indianapolis, IN 46214</b>
<b>Phone Number:</b>	<b>317-271-8652</b>
<b>Registration No.:</b>	<b>097-33135-00713</b>

I hereby certify that Best Equipment & Welding, Inc. is:

still in operation.

I hereby certify that Best Equipment & Welding, Inc. is:

no longer in operation.

in compliance with the requirements of Registration No. 097-33135-00713.

not in compliance with the requirements of Registration No. 097-33135-00713.

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

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

<b>Noncompliance:</b>

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

Technical Support Document (TSD) for a Registration

<b>Source Description and Location</b>
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<b>Source Name:</b>	<b>Best Equipment &amp; Welding, Inc.</b>
<b>Source Location:</b>	<b>1960 Midwest Boulevard, Indianapolis, IN 46214</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>3446 (Architectural and Ornamental Metal Work)</b>
<b>Registration No.:</b>	<b>R097-33135-00713</b>
<b>Permit Reviewer:</b>	<b>Deborah Cole</b>

On April 29, 2013, the Office of Air Quality (OAQ) received an application from Best Equipment & Welding, Inc. related to the operation of an existing stationary operation engaged in the manufacture of architectural and ornamental metal products.

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

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

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> 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 <sub>3</sub>	Attainment effective November 8, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	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.

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.

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

- (b) **PM<sub>2.5</sub>**  
Marion County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

#### **Background and Description of Emission Units and Pollution Control Equipment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Best Equipment & Welding, Inc. on April 29, 2013, relating to the operation of a stationary fabricator of architectural and ornamental metal products.

The source consists of the following existing emission unit(s):

- (a) One (1) spray paint booth, identified as Paint Booth 1, constructed in 1997, using one (1) airless spray applicator to paint metal products, with a maximum coating usage of one (1) gallon of paint per hour, using dry filters as control, and exhausting to stack S1.
- (b) One (1) MIG welding operation, identified as Weld 1, constructed in 1993, with a maximum capacity of 3.75 pounds of electrode per hour, using no control and exhausting to the indoors.
- (c) One (1) metal cutting station using an aqueous cutting coolant, identified as Metal Cutting 1, constructed in 1993, using no control and exhausting to the indoors.

#### **Enforcement Issues**

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

#### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Registration**

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Paint Booth 1	23.80	23.80	23.80	0	0	15.51	0	0	13.20	5.52 (Xylene)
Weld 1	0.09	0.09	0.09	0	0	0	0	0	0.008	0.002 (Manganese)
Metal Cutting 1	0	0	0	0	0	0.11	0	0	0	0
Paved Roads	0.001	0.00	0.00	0	0	0	0	0	0	0
Unpaved Roads	0.23	0.06	0.01	0	0	0	0	0	0	0
<b>Total PTE of Entire Source</b>	<b>24.12</b>	<b>23.95</b>	<b>23.90</b>	<b>0</b>	<b>0</b>	<b>15.62</b>	<b>0</b>	<b>0</b>	<b>13.21</b>	
Registration Levels**	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 100,000	< 25	< 10

\*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".  
 \*\*The 100,000 CO<sub>2</sub>e 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) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM10, PM2.5 and VOC are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) The requirements of the 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 is not engaged in the surface coating of metal furniture.

- (b) The requirements of the 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 is not engaged in the surface coating automobiles or light duty trucks.
- (c) The requirements of the Standards of Performance for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included in the permit, since this source is not engaged in the surface coating of large appliances.
- (d) 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)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Furniture (40 CFR 63, Subpart RRRR), are not included in this permit because the source does not manufacture or coat metal furniture and the source is considered an area source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart RRRR do not apply.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM, are not included in this permit because the source is considered an area source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart MMMM do not apply.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X) are not included in this permit because the SIC code assigned to this source is not one of the listed SIC codes subject to this rule.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, (40 CFR 63.11169, Subpart HHHHHH (6H) are not included for this registration because the source does not use any of the targeted HAPs.
- (e) 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)

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

- (c) 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.
- (d) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 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.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

#### Surface Coating Operation (PB1)

##### 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This rule applies to sources or facilities with a potential to emit particulate matter located in the counties of Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne that are specifically listed in 326 IAC 6.5-2 through 6.5-10 or sources located in the above mentioned counties with either the potential to emit on hundred (100) tons or more per year or actual emissions of ten (10) tons or more. This source is located in Marion County, is not specifically listed in 326 IAC 6.5-6 and has an unlimited potential to emit 24.12 tons of PM per year.

Pursuant to 326 IAC 6.5-1-2(h), surface coating, reinforced plastic composites fabricating manufacturing processes, and graphic arts manufacturing processes shall be controlled by a dry particulate filter, water wash, or an equivalent control device subject to the following:

- (1) The source shall operate the control device in accordance with manufacturer's specifications.
- (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the

source shall inspect the control device and do either of the following no later than four (4) hours after the observation:

- (A) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (3) If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detectable at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

Pursuant to 326 IAC 8-2-1(a)(4), the surface coating booth, identified as Paint Booth1, is subject to the requirements of 326 IAC 8-2-9 because construction commenced after July 1, 1990, the source will apply surface coating to metal parts as defined in 326 IAC 8-2-9(a)(1)(E) and actual VOC emissions are greater than fifteen (15) pounds per day.

Pursuant to 326 IAC 8-2-9(c)(2), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, ore permit the discharge into the atmosphere of an VOC in excess of 3.5 pounds of coating, excluding water, delivered to a coating applicator in a coating application system that is air dried or forced air dried at temperatures up to 194 degrees Fahrenheit.

The source is using compliant coatings.

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

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Welding Operation (Weld 1)

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This rule applies to sources or facilities with a potential to emit particulate matter located in the counties of Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne that are specifically listed in 326 IAC 6.5-2 through 6.5-10 or sources located in the above mentioned counties with either the potential to emit on hundred (100) tons or more per year or actual emissions of ten (10) tons or more. This source is located in Marion County, is not specifically listed in 326 IAC 6.5-6 and has an unlimited potential to emit 24.12 tons of PM per year. Because the actual PM emissions from the source are not limited to 10 tons per year, the source is subject to the requirements of 326 IAC 6.5 which state that particulate matter emissions shall not exceed three-hundredths (0.03) grains per dry standard cubic foot (DSCF).

**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 29, 2013.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 097-33135-00713. The staff recommends to the Commissioner that this Registration be approved.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027, ext. 4-5377.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emission Calculations  
Emission Summary**

**Company Name:** Best Equipment & Welding, Inc.  
**Address City IN Zip:** 1960 Midwest Boulevard, Indianapolis, IN 46214  
**Permit Number:** 097-33135-00713  
**Reviewer:** Deborah Cole

Pollutant	PM	PM2.5	PM10	SO2	NOX	VOC	CO	GHG	Total HAPS	Single HAP
Surface Coating (PB1)	23.80	23.80	23.80	0.00	0.00	15.51	0.00	0.00	13.20	5.52
Welding (Weld 1)	0.09	0.09	0.09	0.00	0.00	0.00	0.00	0.00	0.008	0.002
Metal Cutting (Metal Cut 1)	0.000	0.00	0.00	0.00	0.00	0.11	0.00	0.00	0.00	0.00
Paved Roads	0.001	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unpaved Roads	0.23	0.06	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>TOTALS</b>	<b>24.12</b>	<b>23.95</b>	<b>23.90</b>	<b>0.00</b>	<b>0.00</b>	<b>15.62</b>	<b>0.00</b>	<b>0.00</b>	<b>13.21</b>	

Xylene  
Manganese

PTE is based on 8,760 hours of operation.

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

**Company Name: Best Equipment & Welding, Inc.  
Address City IN Zip: 1960 Midwest Boulevard, Indianapolis, IN 46214  
Permit Number: 097-33135-00713  
Reviewer: Deborah Cole**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Control Efficiency	Particulate PTE After Controls
<b>PPG AMERCOAT 5108 Primer Gray</b>	12.60	28.11%	0.0%	28.1%	0.0%	71.89%	1.000	1.00	3.54	3.54	3.54	85.00	15.51	23.80	71.89	40%	90%	2.38
PPG Industrial Gloss Safety Yellow	9.26	30.08%	0.0%	30.1%	0.0%	69.92%	1.000	1.00	2.79	2.79	2.79	66.85	12.20	17.02	69.92	40%	90%	1.70
PPG Industrial Gloss Safety Black	9.35	30.02%	0.0%	30.0%	0.0%	69.98%	1.000	1.00	2.81	2.81	2.81	67.36	12.29	17.20	69.98	40%	90%	1.72
Stantest 2.8 HAPs Free Yellow	9.00	53.69%	0.0%	53.7%	0.0%	46.31%	1.000	1.00	2.70*	2.70	2.70	64.80	11.83	10.95	43.31	40%	90%	1.10
Stantest 2.8 HAPs Free Black	9.00	64.43%	0.0%	64.4%	0.0%	35.57%	1.000	1.00	2.80*	2.80	2.80	67.20	12.26	8.41	35.57	40%	90%	0.84

**METHODOLOGY**

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

MSDS provided by the source.

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name: Best Equipment & Welding, Inc.  
Address City IN Zip: 1960 Midwest Boulevard, Indianapolis, IN 46214  
Permit Number: 097-33135-00713  
Reviewer: Deborah Cole**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Benzene Emissions (ton/yr)	TOTAL HAPs
<b>PPG AMERCOAT 5108 Primer Gray</b>	12.60	1.00	1.00	10.00%	5.00%	5.00%	5.52	2.76	2.76	11.04
PPG Industrial Gloss Safety Yellow	9.26	1.00	1.00	1.50%	0.00%	1.00%	0.61	0.00	0.41	1.01
PPG Industrial Gloss Safety Black	9.35	1.00	1.00	1.00%	0.00%	0.00%	0.41	0.00	0.00	0.41
Stantest 2.8 HAPs Free Yellow	9.00	1.00	1.00	0.00%	0.00%	1.00%	0.00	0.00	0.39	0.39
Stantest 2.8 HAPs Free Black	9.00	1.00	1.00	0.00%	0.00%	1.00%	0.00	0.00	0.39	0.39
<b>TOTALS</b>							<b>6.54</b>	<b>2.76</b>	<b>3.95</b>	<b>13.20</b>

**METHODOLOGY**

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

**Appendix A: Emissions Calculations**  
**Welding and Thermal Cutting**

**Company Name: Best Equipment & Welding, Inc.**  
**Address City IN Zip: 1960 Midwest Boulevard, Indianapolis, IN 46214**  
**Permit Number: 097-33135-00713**  
**Reviewer: Deborah Cole**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	1	3.75	0.0055	0.0005			0.021	0.002	0.000	0.000	0.002
<b>EMISSION TOTALS</b>											
Potential Emissions lbs/hr							0.02	0.002	0.00	0.00	0.002
Potential Emissions lbs/day							0.50	0.05	0.00	0.00	0.05
Potential Emissions tons/year							<b>0.09</b>	<b>0.008</b>	0.000	0.000	<b>0.008</b>

**Methodology:**

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

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for

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

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

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

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

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

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

**Appendix A: Emission Calculations**  
**VOC Emissions - Aqueous Cutting Operation**

**Company Name:** Best Equipment & Welding, Inc.  
**Address City IN Zip:** 1960 Midwest Boulevard, Indianapolis, IN 46214  
**Permit Number:** 097-33135-00713  
**Reviewer:** Deborah Cole

**Aqueous Cutting Operation**

Material	Specific Gravity	Weight of Water (lb/gal)	% VOC	Max Usage (gal/year)	VOC (lbs/year)	VOC (tons/year)
J-Cut 3900 Cutting Solution	1.04	8.34	25%	100.00	216.84	0.11

**Methodology**

PTE VOC (tons/yr) = Specific Gravity x Weight of Water x %VOC x maximum usage (gal/yr) x 1 ton/2,000 lbs

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

**Company Name: Best Equipment & Welding, Inc.  
Address City IN Zip: 1960 Midwest Boulevard, Indianapolis, IN 46214  
Permit Number: 097-33135-00713  
Reviewer: Deborah Cole**

**Paved Roads at Industrial Site**

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	40.0	1.0	40.0	1.0	40.0	75	0.014	0.6	207.4
Vehicle (leaving plant) (one-way trip)	40.0	1.0	40.0	1.0	40.0	75	0.014	0.6	207.4
	0.0	0.0	0.0	0.0	0.0	0	0.000	0.0	0.0
	0.0	0.0	0.0	0.0	0.0	0	0.000	0.0	0.0
<b>Totals</b>			<b>80.0</b>		<b>80.0</b>			<b>1.1</b>	<b>414.8</b>

Average Vehicle Weight Per Trip =  tons/trip  
Average Miles Per Trip =  miles/trip

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

where k =	PM	PM10	PM2.5	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	0.011	0.0022	0.00054	tons = average vehicle weight (provided by source)
sL =	1.0	1.0	1.0	g/m <sup>3</sup> = Ubiquitous Baseline for Silt Loading for Paved Roads 13.2.1-2)
	0.6	0.6	0.6	

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext =  $E * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext =  $Ef * [1 - (p/4N)]$   
where p =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N =  days per year

Unmitigated Emission Factor, Ef =	PM	PM10	PM2.5	lb/mile
Mitigated Emission Factor, Eext =	0.007	0.001	0.0003	lb/mile
Dust Control Efficiency =	0.006	0.001	0.0003	(pursuant to control measures outlined in fugitive dust control plan)
	0%	0%	0%	

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vehicle (leaving plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Totals</b>	<b>0.001</b>	<b>0.000</b>	<b>0.000</b>	<b>0.001</b>	<b>0.000</b>	<b>0.000</b>	<b>0.001</b>	<b>0.000</b>	<b>0.000</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particle Matter (<2.5 um)  
PTE = Potential to Emit

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

**Company Name:** Best Equipment & Welding, Inc.  
**Address City IN Zip:** 1960 Midwest Boulevard, Indianapolis, IN 46214  
**Permit Number:** 097-33135-00713  
**Reviewer:** Deborah Cole

**Unpaved Roads at Industrial Site**

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Steel delivery (entering plant) (one-way trip)	1.0	1.0	1.0	20.0	20.0	125	0.024	0.0	8.6
Steel delivery (leaving plant) (one-way trip)	1.0	1.0	1.0	20.0	20.0	125	0.024	0.0	8.6
Company shipping (leaving plant) (1-way trip)	5.0	2.0	10.0	5.0	50.0	125	0.024	0.2	86.4
Company shipping (returning) (one-way trip)	5.0	2.0	10.0	5.0	50.0	125	0.024	0.2	86.4
<b>Totals</b>			<b>22.0</b>		<b>140.0</b>			<b>0.5</b>	<b>190.1</b>

Average Vehicle Weight Per Trip =  $\frac{6.4}{0.02}$  tons/trip  
Average Miles Per Trip =  $\frac{0.02}{0.02}$  miles/trip

Unmitigated Emission Factor,  $E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b]$  (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	6.4	6.4	6.4	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$  (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$

where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	3.62	0.92	0.09	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	2.38	0.61	0.06	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.02	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Vehicle (leaving plant) (one-way trip)	0.02	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Company shipping (leaving plant) (1-way trip)	0.16	0.04	0.00	0.10	0.03	0.00	0.10	0.03	0.00
Company shipping (returning) (one-way trip)	0.16	0.04	0.00	0.10	0.03	0.00	0.10	0.03	0.00
<b>Totals</b>	<b>0.34</b>	<b>0.09</b>	<b>0.01</b>	<b>0.23</b>	<b>0.06</b>	<b>0.01</b>	<b>0.23</b>	<b>0.06</b>	<b>0.01</b>

**Methodology**

- Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]
- Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
- Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]
- Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
- Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
- Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Unmitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)
- Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Mitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)
- Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) \* (1 - Dust Control Efficiency)

**Abbreviations**

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

TO: Glenn Foy  
Best Equipment and Welding, Inc.  
1960 Midwest Blvd  
Indianapolis, IN 46214

DATE: July 17, 2013

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

SUBJECT: Final Decision  
Registration  
097 - 33135 - 00713

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:  
Bernard Paul B Paul Consulting  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	LPOGOST 7/17/2013 Best Equipment & Welding, Inc. 097 - 33135 - 00713 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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
3		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
4		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
5		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)										
6		Bernard Paul B Paul Consulting, LLC 285 Spring Drive Zionsville IN 46077 (Consultant)										
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