



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant
DATE: October 25, 2013
RE: CTP Corporation/E081-33519-00061
FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

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 from 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-AM.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Mr. Dan Seybert
CTP Corporation
604 East LaGrande Avenue
Indianapolis, Indiana 46203

October 25, 2013

Re: Exempt Construction and Operation Status,
E081-33519-00061

Dear Mr. Seybert:

The application from CTP Corporation, received on August 12, 2013, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary steel tubing and part manufacturing facility located at 2615 Endress Place, Greenwood, Indiana 46143 is classified as exempt from air pollution permit requirements:

- (a) One (1) Wash Line, consisting of the following:
 - (1) One (1) acid tank, identified by AT-1, constructed in 2006, with a maximum capacity of 2.5 lbs/hour using aqueous solutions containing zero percent (0%) by weight of VOCs and HAPs. The acid cleaner contains phosphoric acid (CAS No. 7664-38-2) and gluconic acid (CAS No. 526-95-4).
 - (2) One (1) acid tank, identified by AT-2, constructed in 2011, with a maximum capacity of 2.5 lbs/hour using aqueous solutions containing zero percent (0%) by weight of VOCs and HAPs. The acid cleaner contains phosphoric acid (CAS No. 7664-38-2) and gluconic acid (CAS No. 526-95-4).
 - (3) One (1) anti rust tank, constructed in 2006, with a maximum capacity of 2.5 lbs/hour, applying an anti rust protective coating to metal parts, utilizing no control devices, and exhausting within the building.
- (b) One (1) natural gas-fired boiler, identified by B-2, constructed in 2006, with a maximum heat input capacity of 0.3125 MMBtu per hour and exhausting to stacks S1 and S2.
- (c) One (1) wax dipping operation, identified as Wax, constructed in 2006, with maximum application rate of 0.3036 pounds of wax per hour. The wax is melted in a pot that vents outside of the facility.
- (d) One (1) lathe, identified as Lathe, constructed in 2006, operated with non-VOC content cooling oil.
- (e) One (1) MIG welding operation, constructed in 2006, consuming less than five (5) pounds of rod or wire per hour and cutting less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness.
- (f) One (1) TIG welding operation, constructed in 2006, consuming less than five (5) pounds of rod or wire per hour and cutting less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness.
- (g) One (1) grinding operation, identified as Grinding, constructed in 2006, composed of three (3) grinders, one (1) table lathe, one (1) bandsaw, one (1) chamfering machine, and one (1) bandsaw strictly used for cardboard. The grinders, lathe, bandsaw, and chamfering machine have



A State that Works

maximum process rate of 4.36 lb/hr. The bandsaw that is strictly used for cardboard has a maximum process rate of 1.09 lb/hr.

- (h) Two (2) natural gas-fired rapid air makeup units, constructed in 2013, each with a maximum heat input capacity of 0.3125 MMBtu/hr.
- (i) Paved roads and parking lots with public access.

The following conditions shall be applicable:

1. 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
2. 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.
3. 326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of indirect Heating)
Pursuant to 326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of indirect Heating), the allowable particulate emission rate from the natural gas-fired boiler shall not exceed 0.6 pound per million Btu per hour.
4. 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)
 - (a) Pursuant to 326 IAC 8-2-9(c), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of the following, when coating metal:
 - (1) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, as delivered to a coating applicator that applies clear coatings.
 - (2) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, as delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
 - (3) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, as delivered to a coating applicator that applies extreme performance coatings.
 - (4) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, as delivered to a coating applicator for all other coatings and coating application systems.
 - (5) If more than one (1) emission limitation in (1) through (4) above applies to a specific coating, then the least stringent emission limitation shall be applied.

- (b) Pursuant to 326 IAC 8-2-9(f), Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

This exemption supersedes E081-24463-00061, issued on June 14, 2007.

A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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. If you have any questions on this matter, please contact Charles Sullivan, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-232-8422 or at 1-800-451-6027 (ext 2-8422).

Sincerely,



Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Source Document (TSD), Appendix A (Calculations)

JRK/cbs

cc: File - Johnson County
Johnson County Health Department
Compliance and Enforcement Branch

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

Technical Support Document (TSD) for an Exemption

Source Description and Location
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Source Name:	CTP Corporation
Source Location:	2615 Endress Place, Greenwood, Indiana 46143
County:	Johnson
SIC Code:	3498 (Fabricated Pipe and Pipe Fittings)
Exemption No.:	E081-33519-00061
Permit Reviewer:	C. Sullivan

On August 12, 2013, the Office of Air Quality (OAQ) received an application from CTP Corporation related to the construction and operation of new emission units at a steel tubing and part manufacturing facility.

Existing Approvals

The source has been operating under Exemption No.: E081-24463-00061, issued on June 14, 2007.

County Attainment Status

The source is located in Johnson County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective October 19, 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	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective federally July 11, 2013, 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. Johnson 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}**
 Johnson County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants
Johnson County has been classified as attainment or unclassifiable in Indiana for other 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 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by CTP Corporation on August 12, 2013 relating to construction and operation of new emission units at a steel tubing and part manufacturing facility.

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

- (a) One (1) Wash Line, consisting of the following:
- (1) One (1) acid tank, identified by AT-1, constructed in 2006, with a maximum capacity of 2.5 lbs/hour using aqueous solutions containing zero percent (0%) by weight of VOCs and HAPs. The acid cleaner contains phosphoric acid (CAS No. 7664-38-2) and gluconic acid (CAS No. 526-95-4).
 - (2) One (1) acid tank, identified by AT-2, constructed in 2011, with a maximum capacity of 2.5 lbs/hour using aqueous solutions containing zero percent (0%) by weight of VOCs and HAPs. The acid cleaner contains phosphoric acid (CAS No. 7664-38-2) and gluconic acid (CAS No. 526-95-4).
 - (3) One (1) anti rust tank, constructed in 2006, with a maximum capacity of 2.5 lbs/hour, applying an anti rust protective coating to metal parts, utilizing no control devices, and exhausting within the building.
- (b) One (1) natural gas-fired boiler, identified by B-2, constructed in 2006, with a maximum heat input capacity of 0.3125 MMBtu per hour and exhausting to stacks S1 and S2.
- (c) One (1) wax dipping operation, identified as Wax, constructed in 2006, with maximum application rate of 0.3036 pounds of wax per hour. The wax is melted in a pot that vents outside of the facility.
- (d) One (1) lathe, identified as Lathe, constructed in 2006, operated with non-VOC content cooling oil.
- (e) One (1) MIG welding operation, constructed in 2006, consuming less than five (5) pounds of rod or wire per hour and cutting less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness.
- (f) One (1) TIG welding operation, constructed in 2006, consuming less than five (5) pounds of rod or wire per hour and cutting less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness.
- (g) One (1) grinding operation, identified as Grinding, constructed in 2006, composed of three (3) grinders, one (1) table lathe, one (1) bandsaw, one (1) chamfering machine, and one (1) bandsaw strictly used for cardboard. The grinders, lathe, bandsaw, and chamfering machine have

maximum process rate of 4.36 lb/hr. The bandsaw that is strictly used for cardboard has a maximum process rate of 1.09 lb/hr.

- (h) Two (2) natural gas-fired rapid air makeup units, constructed in 2013, each with a maximum heat input capacity of 0.3125 MMBtu/hr.
- (i) Paved roads and parking lots with public access.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Exemption

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 ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Wash Line	--	--	--	--	--	7.91	--	--	7.91	2.77 N-hexane/ Xylene
Welding	1.06	1.06	1.06	--	--	--	--	--	Negl.	Negl. Manganese
Wax Dipping	--	--	--	--	--	0.97	--	--	--	--
Grinding & Cutting Operations	0.98	0.10	0.10	--	--	--	--	--	--	--
Lathe Oil Usage	--	--	--	--	--	0.00	--	--	--	--
Natural Gas Combustion	0.01	0.03	0.03	Negl.	0.40	0.02	0.34	486	Negl.	Negl. Hexane
Paved Roads	0.12	0.02	0.01	--	--	--	--	--	--	--
Total PTE of Entire Source	2.16	1.21	1.19	Negl.	0.40	8.90	0.34	486	7.92	2.77 N-hexane/ Xylene
Exemptions Levels**	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 100,000	< 25	< 10
Registration Levels**	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 100,000	< 25	< 10

Negl. = negligible

*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 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) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (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 CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in the exemption for the one (1) natural gas-fired boiler, identified by B-2, and two (2) natural gas-fired makeup unit heaters since each has a maximum design capacity of less than ten (10) MMBtu per hour.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this exemption.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of 40 CFR 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters), are not included in this exemption for the boiler at this source, because this source is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJJ, are not included in the exemption for the boiler at this source, because it meets the definition of gas-fired boiler, as defined by 40 CFR 63.11237, and therefore is specifically exempt from the requirements of this subpart pursuant to 40 CFR 63.11195(e).
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11514 Subpart XXXXXX (6X), are not included for this proposed amendment, this source is not primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of 40 CFR 63.11514. In addition, CTP Corporation operates under SIC code 3498 "Fabricated Pipe and Pipe Fittings", which is not identified in the list of Standard Industrial Classification (SIC) codes included in Table 1 of the Federal Register (FR) publication of the final rule; therefore, the requirements of NESHAP Subpart XXXXXX are not applicable to the source.
- (f) The requirements of the NESHAP for Halogenated Solvent Cleaning, 40 CFR Part 63, Subpart T (326 IAC 20-6) are not included in this exemption because it does not use any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the registration.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption 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 nonoverlapping 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.

Acid Tanks (AT-1 & AT-2)

- (h) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
The wash line, identified as AT-1, AT-2 and soap tank are not performing organic solvent degreasing operations, as defined by 326 IAC 1-2-18.5 because these tanks do not utilize organic solvents as defined by 326 IAC 1-2-72. Therefore, the wash line tanks are not subject to the requirements of 326 IAC 8-3.

Anti Rust Tank

- (i) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(5), the Anti Rust Tank is exempt from the requirements of 326 IAC 6-3 since it performs surface coating using dip coating.
- (j) 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)
The Anti Rust Tank was constructed after July 1, 1990, has actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls, and applies a coating to metal parts or products under the Standard Industrial Classification Code of major group #34. Pursuant to 326 IAC 8-2-9:
- (1) No owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:
- (A) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that:
- (i) lacks color or opacity; and
 - (ii) is transparent and uses the undercoat as a reflectant base or undertone color.
- (B) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
- (C) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:
- (i) temperatures consistently above ninety-five (95) degrees Celsius;
 - (ii) detergents;
 - (iii) abrasive or scouring agents;
 - (iv) solvents;
 - (v) corrosive atmospheres;
 - (vi) outdoor weather at all times; or

- (vii) similar environmental conditions.
 - (D) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.
 - (E) If more than one (1) emission limitation in (A) through (D) above applies to a specific coating, then the least stringent emission limitation shall be applied.
- (2) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
- (A) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (B) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (C) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (D) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (E) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Grinding / Cutting Operations

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 are not applicable to any of the emission units comprising the grinding and cutting operations, since each has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore pursuant to 326 IAC 6-3-1(b)(14), the grinding operation is exempt from this rule.

Welding Operations

- (l) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), each of the welding operations are exempt from the requirements of 326 IAC 6-3, because each has the potential to consume welding wire of less than six hundred twenty-five (625) pounds per day.

Natural Gas Combustion

- (m) 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
- (1) The requirements of 326 IAC 6-2-4 are not applicable to the two (2) makeup units, since the makeup units are not sources of direct heating.
 - (2) The natural gas-fired boiler, identified as B-2, is subject to the requirements of 326 IAC 6-2-4, because the unit began operation after September 21, 1983. Pursuant to 326 IAC 6-

2-4(a), particulate emissions from the natural gas-fired water boiler, identified as B-2, shall be limited to 0.6 pounds per MMBtu heat input since Q is less than 10 MMBtu/hr.

Based on the AP-42, Chapter 1.4, natural gas combustion particulate emission factor of 1.9 pounds per million cubic foot (MMCF) of natural gas, the natural gas-fired water boiler at this source has particulate emissions as follows:

$$(1.9 \text{ pound PM/MMCF}) * (\text{MMCF}/1000 \text{ MMBtu}) = 0.0019 \text{ pound PM per MMBtu}$$

Therefore, the natural gas-fired boiler is able to comply with the particulate emission limitations under 326 IAC 6-2 without the use of a control device.

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 August 12, 2013; additional material was received on August 29 and September 16, 2013.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. E081-33519-00061. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Charles Sullivan 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) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.
- (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
Emissions Summary**

Company Name: CTP Corporation
Source Address: 2615 Endress Place, Greenwood, IN 46143
Permit Number: E081-33519-00061
Reviewer: C. Sullivan
Date: 9/9/2013

Unlimited / Uncontrolled Potential to Emit:

Emitting Activities	PM	PM ₁₀	PM _{2.5}	SO ₂	NOX	VOC	CO	GHGs as CO ₂ e	Pb	Combined HAPs	Highest Single HAP	
Wash Lines	N/A	N/A	N/A	N/A	N/A	7.91	N/A	N/A	N/A	7.91	2.77	N-hexane or Xylene
Welding	1.06	1.06	1.06	N/A	N/A	N/A	N/A	N/A	N/A	1.93E-03	1.49E-03	Manganese
Wax Dipping	N/A	N/A	N/A	N/A	N/A	0.97	N/A	N/A	N/A	N/A	N/A	N/A
Grinding Operations	0.98	0.10	0.10	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lathes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Natural Gas Fired Heaters	0.01	0.03	0.03	2.42E-03	0.40	0.02	0.34	486	2.01E-06	7.60E-03	7.25E-03	Hexane
Paved Roads	0.12	0.02	0.01	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	2.16	1.21	1.19	2.42E-03	0.40	8.90	0.34	486	2.01E-06	7.92	2.77	N-hexane or Xylene

**Appendix A: Emission Calculations
Wash Line Emissions**

Company Name: CTP Corporation
Source Address: 2615 Endress Place, Greenwood, IN 46143
Permit Number: E081-33519-00061
Reviewer: C. Sullivan
Date: 9/9/2013

Description of Wash Line:

CTP has one (1) acid wash line composed of two (2) acid cleaning tanks for cleaning metal parts prior to shipping. The parts are then coated with Anti Rust 8133 CH1. This line uses the following products: Scumbugs SAA1.1, Acid Cleaner 5557, and Anti Rust 8133CH1. Only 8133 Contains VOC. Although the facility has added an acid cleaning tank, there is still only 1 Anti Rust tank (8133) so the VOC emissions have not changed.

VOC Containing Product Information:

Product Name	Anti Rust 8133CH1 (11410010)
Product Mfg	Fuchs Lubricants Co.
Specific Gravity ⁽¹⁾	0.80
Product Density [lb/gal] ⁽²⁾	6.67
VOC Content [wt. %] ⁽¹⁾	68%
Annual Product Purchase [gal/yr] ⁽⁵⁾	2,325
Maximum Product Usage [gal/yr] ⁽³⁾	3,488

HAP Components	Weight % ⁽¹⁾	Potential HAP Emissions
N-hexane	25-35%	2.77
Xylene	25-35 %	2.77
Toluene	15-20 %	1.58
Cyclohexane	15-20 %	1.58
Ethylbenzene	5-7 %	0.55
Benzene	3-5 %	0.40
1,2,4-Trimethylbenzene	2-3 %	0.24

Potential Emissions:

Potential VOC Emissions [tpy] ⁽⁴⁾	7.91
--	------

Additional Information:

(1) This data was obtained from the manufacturer's MSDS for this product.

(2) Coating Density [lb/gal] = Specific Gravity x 8.34 lb/gal

(3) Max. Product Usage [gal/yr] = Actual Product Usage [gal/yr] x 1.5 safety factor

(4) Worst case weight % used.

This product is contained in an open tank and therefore would evaporate evenly over the year

(4) Potential VOC/HAP Emissions [tpy] = Product Density [lb/gal] * VOC/HAP Content [%] * Maximum Product Usage [gal/yr] / 2,000 [lb/ton]

(5) Based upon purchase records from 2012

**Appendix A: Emission Calculations
Welding Operation**

**Company Name: CTP Corporation
Source Address: 2615 Endress Place, Greenwood, IN 46143
Permit Number: E081-33519-00061
Reviewer: C. Sullivan
Date: 9/9/2013**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS (lb pollutant/lb electrode)				Potential to Emit (tons/year)			
			PM=PM10=PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr
TIG Welder	1	5	2.41E-02	3.40E-05	NA	1.00E-05	0.53	7.45E-04	0.00E+00	2.19E-04
MIG Welder (carbon steel)	1	5.0	2.41E-02	3.40E-05	NA	1.00E-05	0.53	7.45E-04	0.00E+00	2.19E-04
TOTAL							1.06	1.49E-03	0.00E+00	4.38E-04

Notes:

MIG welding emission factors are from AP 42, Chapter 12-19, Tables 12-19.1 and 12-19.2 (SCC 3-09-052-26) January 1995.
Electrode consumption is taken from Exemption No. E081-33519-00061.

Methodology:

PTE (tons/year) = Number of Stations x Electrode Consumption (lbs/hour) x Emission Factor (lbs /lb electrode) x 8760 (hours/year) x 1 ton/2,000 lbs

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
Wax Dipping Emissions**

Company Name: CTP Corporation
Source Address: 2615 Endress Place, Greenwood, IN 46143
Permit Number: E081-33519-00061
Reviewer: C. Sullivan
Date: 9/9/2013

VOC Emissions

Material	Substrate	Weight % Organics	Maximum Application Rate (lb/hr)	PTE of VOC*** (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)
DS250, 260, 300, 301-304	Metal	73.00%	0.304	0.22	5.32	0.97
Worst Case PTE						0.97
Control Efficiency						-
Controlled Emissions						0.97

HAP Emissions

Material	
DS250, 260, 300, 301-304	Wax does not contain any HAPs

Notes

1200 Pounds used in 2012
1800 Multiplied by safety factor of 1.5 to ensure worst-case scenario is represented
5928 Hours operated 2011
0.3036 Maximum application rate (lb/hr)

Assumed worst-case scenario that the oil mixture, soybean oil, and dibutyl phthalate are completely volatile.
This is a dip coating process resulting in no particulate emissions.

METHODOLOGY

PTE of VOC (lbs/hr) = Maximum Application Rate (lb/hr) * Weight % Organics
PTE of VOC (lbs/day) = Maximum Application Rate (lb/hr) * Weight % Organics * 24 (hr/day)
PTE of VOC (tons/yr) = Maximum Application Rate (lb/hr) * Weight % Organics * 8,760 (hr/yr) * (1 ton/2,000 lbs)

**Appendix A: Emission Calculations
Grinding/Cutting Operations**

Company Name: CTP Corporation
Source Address: 2615 Endress Place, Greenwood, IN 46143
Permit Number: E081-33519-00061
Reviewer: C. Sullivan
Date: 9/9/2013

Grinders	Material	Uncontrolled Process Rate (lb/hr)	Uncontrolled Process Rate (tons/hr)	PM Emission Factor (lbs emitted/ton processed)	Total PM Potential to Emit (tons/yr)	PM10 Emission Factor (lbs emitted/ton processed)	Total PM10 Potential to Emit (tons/yr)	Control Efficiency (%)	Controlled Potential to Emit PM (tons/yr)	Controlled Potential to Emit PM10 (tons/yr)
Grinder 1	steel	4.36	0.0022	17	0.16	1.70	0.02	0%	0.16	0.02
Grinder 2	steel	4.36	0.0022	17	0.16	1.70	0.02	0%	0.16	0.02
Grinder 3	steel	4.36	0.0022	17	0.16	1.70	0.02	0%	0.16	0.02
Small table lathe	steel	4.36	0.0022	17	0.16	1.70	0.02	0%	0.16	0.02
Metal Mizer bandsaw	steel	4.36	0.0022	17	0.16	1.70	0.02	0%	0.16	0.02
Chamfering machine	steel	4.36	0.0022	17	0.16	1.70	0.02	0%	0.16	0.02
Bandsaw	cardboard	1.09	0.0005	0.09	2.19E-04	0.09	2.19E-04	0%	2.19E-04	2.19E-04
Total					0.98		0.10		0.98	0.10

Methodology

Emission Factors for steel assumed to be equal to the US EPA WebFIRE emission factors for Grey Iron Foundry Grinding (SCC 30400340)

Emission Factor for cardboard estimated to be 0.1% of the weight percent of the amount of cardboard processed

Total PTE (tons/yr) = Uncontrolled Process Rate (lb/hr) * Emission Factor (lbs emitted/ton processed) * 8760 (hrs/yr) /2000 (lbs/ton)

Controlled PTE = Total PTE (tons/yr) * (1-Control Efficiency)

- 3450041 Pounds of various alloys processed in 2011
- 5175061.5 Multiplied by safety factor of 1.5 to ensure worst-case scenario is represented
- 0.50% Surface area percentage subject to grinding
- 25875.3075 Total Amount ground per year
- 5928 Hours operated 2011
- 4.364930415 Maximum hourly process rate

Notes

The cardboard bandsaw is used to cut cardboard tubes for reuse as shipping separators to help prevent damage to product.

Much less cardboard is cut than steel, so the cardboard process rate was conservatively estimated to be 25% that of the steel processing to ensure worst-case scenario is reflected

Assumed PM2.5 = PM10

**Appendix A: Emission Calculations
Lathe Cutting Oil VOC Emissions**

Company Name: CTP Corporation
Source Address: 2615 Endress Place, Greenwood, IN 46143
Permit Number: E081-33519-00061
Reviewer: C. Sullivan
Date: 9/9/2013

VOC Emissions

ID #	Lathe ID	Lathe Cutting Oil	Product Density (lb/gal)	Potential Coating Usage (gal/lb)	Maximum Facility Processing Rate (lb/hr)	Flash-off (%)	VOC Content (lbs/gal) ¹	Potential VOC Emissions (lbs/hr)	Potential VOC Emissions (tons/yr)
Small Lathe	1	Towercool 455	8.31	3.83E-04	872.99	100%	N/A	N/A	N/A

Methodology

Maximum product rate determined by using 2011 alloy usage (lbs) from Form R data and multiplying by safety factor of 1.5. This was divided by number of hours actually worked in 2011

Potential VOC Emissions (lbs/hr) = Potential Coating Usage (gal/lb) x Maximum Product Rate (lb/hr) x Flash-off (%) x VOC Content (lbs/gal)

Potential Emissions (tons/yr) = Potential Emissions (lb/hr) * 8,760 hrs/yr x 1 ton/2,000 lb

¹ Towercool 455 - non-VOC content oil from MSDS sheet

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

**Company Name: CTP Corporation
Source Address: 2615 Endress Place, Greenwood, IN 46143
Permit Number: E081-33519-00061
Reviewer: C. Sullivan
Date: 9/9/2013**

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	1.5	60.0	1.0	60.0	330	0.063	3.8	1368.8
Vehicle (leaving plant) (one-way trip)	40.0	1.5	60.0	1.0	60.0	330	0.063	3.8	1368.8
Totals			120.0		120.0			7.5	2737.5

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)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	1.0	1.0	1.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.087	0.017	0.0043	lb/mile
Mitigated Emission Factor, Eext =	0.080	0.016	0.0039	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.06	0.01	0.00	0.05	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.06	0.01	0.00	0.05	0.01	0.00
Totals	0.12	0.02	0.01	0.11	0.02	0.01

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

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

**Company Name: CTP Corporation
Address City IN Zip: 2615 Endress Place, Greenwood, IN 46143
Permit Number: E081-33519-00061
Reviewer: C. Sullivan
Date: 9/9/2013**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	Heat Input Capacity includes: 2 Rapid Air Makeup Units at 0.3125 MMBtu/hr 1- NG fired boiler at 0.3125 MMBtu/hr
0.94	1020	8.05	

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.01	0.03	0.03	2.42E-03	0.40	0.02	0.34

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

Methodology

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

HAPS Calculations

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	8.454E-06	4.831E-06	3.019E-04	7.246E-03	1.369E-05	7.575E-03

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.013E-06	4.428E-06	5.636E-06	1.530E-06	8.454E-06	2.206E-05

Total HAPs	7.597E-03
Worst HAP	7.246E-03

Methodology is the same as above.

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	483	9.26E-03	8.86E-03
Summed Potential Emissions in tons/yr	483		
CO2e Total in tons/yr	486		

Methodology

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



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
CTP Corporation
604 East LaGrande Avenue
Indianapolis, IN 46203

DATE: October 25, 2013

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

SUBJECT: Final Decision
Exempt Construction and Operation Status
E081-33519-00061

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, H & S Inc.
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

Mail Code 61-53

IDEM Staff	PWAY 10/25/2013 CTP Corporation (Endress) 081-33519-00061 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Dan Seybert CTP Corporation (Endress) 604 E LaGrande Ave Indianapolis IN 46203 (Source CAATS)										
2		Johnson County Commissioners 5 East Jefferson Franklin IN 46131 (Local Official)										
3		Johnson County Health Department 86 W. Court St, Courthouse Annex Franklin IN 46131-2345 (Health Department)										
4		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
5		Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party)										
6		Greenwood City Council and Mayors Office 2 N. Madison Ave. Greenwood IN 46142 (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.
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