



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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and
Federally Enforceable State Operating Permit (FESOP)
for Kennedy Tank and Manufacturing Co., Inc. in Marion County

Permit No. F097-33787-00554

The Indiana Department of Environmental Management (IDEM) has received an application from Kennedy Tank and Manufacturing, Inc. located at 833 East Sumner Ave., Indianapolis, for a New Source Review and Federally Enforceable State Operating Permit (FESOP). Due to this application, the source is transitioning from a Minor Source Operating Permit (MSOP) to a FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Kennedy Tank and Manufacturing Co., Inc. to make certain changes at its existing source.

This draft FESOP contains new equipment that will emit air pollutants; therefore, some conditions from previously issued permits/approvals have been corrected, changed or removed. These corrections, changes, and removals may include Title I changes. This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow for these changes.

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

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

Indianapolis Marion County Public Library - Garfield Park Branch
2502 Shelby Street
Indianapolis, IN 46203

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

How can you participate in this process?

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

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



A State that Works

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F097-33787-00554 in all correspondence.

Comments should be sent to:

Tamera Wessel
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-8530
Or dial directly: (317) 234-8530
Fax: (317)-232-6749 attn: Tamera Wessel
E-mail: twessel@idem.in.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

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

If you have any questions please contact Tamera Wessel or my staff at the above address.



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



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

DRAFT

**Kennedy Tank & Manufacturing Co., Inc.
833 East Sumner Ave
Indianapolis, Indiana IN**

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

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

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

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

Operation Permit No.: F097-33787-00554	
Issued by:	Issuance Date:
Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Expiration Date:



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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary tank manufacturing facility.

Source Address:	833 East Sumner Ave., Indianapolis, Indiana IN
General Source Phone Number:	317-780-3594
SIC Code:	3443 (Fabricated Plate Work)
County Location:	Marion (Perry Township)
Source Location Status:	Nonattainment for SO ₂ standard
Source Status:	Attainment for all other criteria pollutants
	Federally Enforceable State Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

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

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

- (a) One (1) paint spray booth, identified as PB1, constructed in 1991, utilizing an airless and air-assisted airless system, using 0.0084 gallons of coating per square foot at a rate of 1,480 square feet per hour, using a dry filter for particulate matter overspray control and exhausting to stack 1 identified as ST1.
- (b) One (1) paint spray booth, identified as PB2, constructed in 1991, utilizing an airless and air-assisted airless system, using 0.0084 gallons of coating per square foot at a rate of 1,480 square feet per hour, using a dry filter for particulate matter overspray control and exhausting to stack 2, identified as ST2.
- (c) One (1) fiberglass gel application process, identified as FG6, constructed in 1991, with a maximum production rate of 0.13 tanks per hour, using a dry filter for particulate matter control, and exhausting to stack ST6.
- (d) One (1) plasma cutting table, identified as PT8, constructed in 2000, with no add-on control, a maximum production rate of 7.92 cubic inches removed per minute, and exhausting indoors.

This is an affected facility under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

- (e) One (1) stationary dry sandblasting operation, blasting structural steel, with a nozzle pressure of one hundred (100) pounds per square inch (psi), and an internal nozzle diameter of 0.50 inches with a dust collector, constructed August 31, 1991, and exhausting indoors.

This is an affected facility under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source

Categories 40 CFR 63, Subpart XXXXXX.

- (f) The following equipment related to welding activities resulting in the emission of HAPs, PM and PM 10:

- (1) Four (4) stations utilizing Submerged Arc
- (2) Thirty-five (35) stations utilizing Metal Inert Gas (MIG)(carbon steel)
- (3) Six (6) stations utilizing Tungsten Inert Gas (TIG)(carbon steel)

These are affected facilities under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

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

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) One (1) degreaser operation that does not exceed one hundred forty-five (145) gallons per twelve (12) months.
- (b) Twenty-four (24) natural gas-fired heaters, identified as SH1 through SH24, with a combined total heat input of 3.5 million Btu per hour.
- (c) Paved and unpaved roadways.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

- (a) This permit, F097-33787-00554, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.4 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.5 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

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

requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.11 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F097-33787-00554 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

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

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

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

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

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

Records of required monitoring information include the following, where applicable:

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

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

- (b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) paint spray booth, identified as PB1, constructed in 1991, utilizing an airless and air-assisted airless system, using 0.0084 gallons of coating per square foot at a rate of 1,480 square feet per hour, using a dry filter for particulate matter overspray control and exhausting to stack 1 identified as ST1.
- (b) One (1) paint spray booth, identified as PB2, constructed in 1991, utilizing an airless and air-assisted airless system, using 0.0084 gallons of coating per square foot at a rate of 1,480 square feet per hour, using a dry filter for particulate matter overspray control and exhausting to stack 2, identified as ST2.
- (c) One (1) fiberglass gel application process, identified as FG6, constructed in 1991, with a maximum production rate of 0.13 tanks per hour, using a dry filter for particulate matter control, and exhausting to stack ST6.

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

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

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

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The total input of volatile organic compounds (VOCs) delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass gel application process (FG-6) shall not exceed ninety-eight (98.00) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total input of any single HAP delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass gel application process (FG-6) shall not exceed nine and five tenths (9.50) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total input of combined HAPs delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass gel application process (FG-6) shall not exceed seventeen (17.00) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than one hundred (100) tons per twelve (12) consecutive month period, any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, the total input of volatile organic compounds (VOCs) delivered to the fiberglass gel application process (FG6) shall not exceed twenty-four (24.00) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit VOC from the fiberglass gel application process (FG6) to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

D.1.3 Particulate Matter Limitations Except Lake County [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(h) particulate emissions from the two (2) paint spray booths (PB1 and PB2) and the fiberglass gel application process (FG6) shall be controlled by a dry particulate filter, or an equivalent control device, and the Permittee shall operate the control device(s) in accordance with manufacturer's specifications.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

The Permittee shall comply with the following for paint spray booths (PB1 and PB2):

- (a) Pursuant to 326 IAC 8-2-9(c)(2), the Permittee shall not allow the discharge into the atmosphere of volatile organic compounds (VOC) in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating excluding water, for air dried or forced warm air dried coatings as delivered to the applicator at the paint booths (PB1 and PB2).
- (b) Pursuant to 326 IAC 8-2-9(d)(2), one (1) or a combination of the following equipment shall be used for coating application:
 - (A) Electrostatic equipment.
 - (B) High volume low-pressure (HVLP) spray equipment.
 - (C) Flow coating.
 - (D) Roller coating.
 - (E) Dip coating, including electrodeposition.
 - (F) Airless spray.
 - (G) Air-assisted airless spray.
 - (H) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

D.1.5 Volatile Organic Compounds (VOC) Work Practices Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), the following 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:

- (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.

D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC input and content limitations and HAP input limitations contained in Conditions D.1.1, D.1.2, and D.1.4(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) VOC/HAP emissions from resins shall be calculated by multiplying the usage of each resin by the emission factor provided by the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, October 2009 or its updates. VOC/HAP emissions from all other operations shall be calculated using the following equation:

$$E = \sum_{i=1}^{i=n} \left((A_i \times B_i) / 2000 \right) \times (UEF_i / 2000)$$

Where:

E = VOC/HAP emissions (tons/month)

n = no. of coatings used during the day

A_i = Density (lb/gal resin or gel)

B_i = Gallons of resin or gel used per month

UEF_i = Unified Emission Factor for Open Molding of Composites (lb monomer/ton resin or gel)

i = type of resin or gel

2000 = conversion factor (lbs/ton)

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in Condition D.1.4(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum (U)]$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks (ST1 and ST2) and the fiberglass gel

application stack (ST-6) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from stacks ST-1, ST-2, and ST-6, and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirement

- (a) To document the compliance status with Conditions D.1.1, D.1.2, and D.1.4(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limitations established in Conditions D.1.1, D.1.2, and D.1.4(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC and HAP content of each coating material, solvent and resin used.
 - (2) The amount of coating material, solvent and resin used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC, single HAP and total HAPs emitted for each month.
 - (5) The total VOC, single HAP and total HAPs emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.11 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IA

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) One (1) stationary dry sandblasting operation, blasting structural steel, with a nozzle pressure of one hundred (100) pounds per square inch (psi), and an internal nozzle diameter of 0.50 inches with a dust collector, constructed August 31, 1991, and exhausting indoors.

This is an affected facility under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63, Subpart XXXXXX.

- (f) The following equipment related to welding activities resulting in the emission of HAPs, PM and PM 10:

- (1) Four (4) stations utilizing Submerged Arc
- (2) Thirty-five (35) stations utilizing Metal Inert Gas (MIG)(carbon steel)
- (3) Six (6) stations utilizing Tungsten Inert Gas (TIG)(carbon steel)

These are affected facilities under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

Insignificant Activities:

- (b) Twenty-four (24) natural gas-fired heaters, identified as SH1 through SH24, with a combined total heat input of 3.5 million Btu per hour.

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

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

D.2.1 FESOP Limitations [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The PM10 emissions (after control) from the sandblasting operation, SB3, shall not exceed 6.96 pounds per hour (lbs/hr).
- (b) The PM2.5 emissions (after control) from the sandblasting operation, SB3, shall not exceed 6.96 pounds per hour (lbs/hr).

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than one hundred (100) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.2 PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2]

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

- (1) The PM emissions (after control) from the sandblasting operation, SB3, shall not exceed 8.10 pounds per hour (lbs/hr).

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.3 Particulate Matter Limitations [326 IAC 6.5]

- (a) Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the sandblasting operation shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (b) Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the natural gas-fired space heaters (SH1 through SH24) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (c) Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from each of the welding operations, four (4) submerged arc stations, thirty-five (35) MIG stations and six (6) TIG stations, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.5 Particulate Matter (PM)

- (a) In order to comply with Condition D.2.2 and D.2.3(a), the dust collector for particulate matter control shall be in operation and control emissions from the stationary dry sandblasting operation at all times that the sandblasting operation is in operation.
- (b) In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.6 Parametric Monitoring

The Permittee shall record the pressure drop across the dust collector used in conjunction with the sandblasting operation, at least once per day when the sandblasting operation is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop

between 0.5 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during a stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.7, the Permittee shall maintain daily records of the pressure drop across the dust collector controlling the sandblasting operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

- (a) One (1) degreaser operation that does not exceed one hundred forty-five (145) gallons per twelve (12) months.

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

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

D.3.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

- (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.4 Record Keeping Requirements

To document the compliance status with Condition D.3.2, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (a) The name and address of the solvent supplier.
- (b) The date of purchase.
- (c) The type of solvent purchased.
- (d) The total volume of the solvent purchased.
- (e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

SECTION E.1

FACILITY OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) plasma cutting table, identified as PT8, constructed in 2000, with no add-on control, a maximum production rate of 7.92 cubic inches removed per minute and exhausting indoors.

This is an affected facility under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

- (e) One (1) stationary dry sandblasting operation, blasting structural steel, with a nozzle pressure of one hundred (100) pounds per square inch (psi), and an internal nozzle diameter of 0.50 inches with a dust collector, constructed August 31, 1991, and exhausting indoors.

This is an affected facility under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63, Subpart XXXXXX.

- (f) The following equipment related to welding activities resulting in the emission of HAPs, PM and PM 10:

- (1) Four (4) stations utilizing Submerged Arc
- (2) Thirty-five (35) stations utilizing Metal Inert Gas (MIG)(carbon steel)
- (3) Six (6) stations utilizing Tungsten Inert Gas (TIG)(carbon steel)

These are affected facilities under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

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

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 63, Subpart XXXXXX.

E.1.2 Nine Metal Fabrication and Finishing Source Categories [40 CFR 63, Subpart XXXXXX]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart XXXXXX (included as Attachment A of this permit) as specified below:

- (1) 40 CFR 63.11514(a)(3) and (b)(1), (5), (c), (i)
- (2) 40 CFR 63.11515(a)
- (3) 40 CFR 63.11516(a)(3), (f)
- (4) 40 CFR 63.11517
- (5) 40 CFR 63.11519(a)(1)(i), (ii), (iii), (iv), (a)(2)(i), (ii), (iv)
- (6) 40 CFR 63.11519(b)(1), (2), (4), (5), (6), (8), (9)

- (7) 40 CFR 63.11519(c)(1), (2), (3), (4), (11), (12), (13), (14), (15)
- (8) 40 CFR 63.11521
- (9) 40 CFR 63.11522
- (10) 40 CFR 63.11523
- (11) Table 1 to 40 CFR 63 Subpart XXXXXX
- (12) Table 2 to 40 CFR 63 Subpart XXXXXX

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Kennedy Tank & Manufacturing Co., Inc.
Source Address: 833 East Sumner Ave, Indianapolis, Indiana IN
FESOP Permit No.: F097-33787-00554

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

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)_____
- ☐ Report (specify)_____
- ☐ Notification (specify)_____
- ☐ Affidavit (specify)_____
- ☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Kennedy Tank & Manufacturing Co., Inc.
Source Address: 833 East Sumner Ave, Indianapolis, Indiana IN
FESOP Permit No.: F097-33787-00554

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Kennedy Tank & Manufacturing Co., Inc.
Source Address: 833 East Sumner Ave, Indianapolis, Indiana IN
FESOP Permit No.: F097-33787-00554
Facility: Paint Booths - PB1 and PB2 and Fiberglass Gel Application Process - FG6
Parameter: VOC Input
Limit: The total input of volatile organic compounds (VOCs) delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass gel application process (FG-6) shall not exceed ninety-eight (98.00) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Input VOC (Tons) This Month	Input VOC (Tons) Previous 11 Months	Input VOC (Tons) 12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

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

FESOP Quarterly Report

Source Name: Kennedy Tank & Manufacturing Co., Inc.
Source Address: 833 East Sumner Ave, Indianapolis, Indiana IN
FESOP Permit No.: F097-33787-00554
Facility: Fiberglass Gel Application Process - FG6
Parameter: VOC Input
Limit: The total input of volatile organic compounds (VOCs) delivered to the fiberglass gel application process (FG6) shall not exceed twenty-four (24.00) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Input VOC (Tons) This Month	Input VOC (Tons) Previous 11 Months	Input VOC (Tons) 12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

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

FESOP Quarterly Report

Source Name: Kennedy Tank & Manufacturing Co., Inc.
Source Address: 833 East Sumner Ave, Indianapolis, Indiana IN
FESOP Permit No.: F097-33787-00554
Facility: Paint Booths - PB1 and PB2 and Fiberglass Gel Application Process - FG6
Parameter: Total HAP input
Limit: The total input of combined HAPs delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass gel application process (FG-6) shall not exceed seventeen (17.00) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Combined HAP Input (Tons) This Month	Combined HAP Input (Tons) Previous 11 Months	Combined HAP Input (Tons) 12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

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

FESOP Quarterly Report

Source Name: Kennedy Tank & Manufacturing Co., Inc.
Source Address: 833 East Sumner Ave, Indianapolis, Indiana IN
FESOP Permit No.: F097-33787-00554
Facility: Paint Booths - PB1 and PB2 and Fiberglass Gel Application Process - FG6
Parameter: Single HAP input
Limit: The total input of any single HAP delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass gel application process (FG-6) shall not exceed nine and five tenths (9.50) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Worst Single HAP Input (Tons) This Month	Worst Single HAP Input (Tons) Previous 11 Months	Worst Single HAP Input (Tons) 12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

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

Source Name: Kennedy Tank & Manufacturing Co., Inc.
Source Address: 833 East Sumner Ave, Indianapolis, Indiana IN
FESOP Permit No.: F097-33787-00554

Months: _____ to _____ Year: _____

Page 1 of 2

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**Attachment A to
FESOP No.: F097-33787-00554**

Downloaded from the eCFR on November 1, 2013

Electronic Code Of Federal Regulations

Title 40: Protection of Environment

40 CFR 63, Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

SOURCE: 73 FR 43000, July 23, 2008, unless otherwise noted.

APPLICABILITY AND COMPLIANCE DATES

§63.11514 Am I subject to this subpart?

- (a) You are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of this section. Descriptions of these source categories are shown in Table 1 of this subpart. “Primarily engaged” is defined in §63.11522, “What definitions apply to this subpart?”
- (1) Electrical and Electronic Equipment Finishing Operations;
 - (2) Fabricated Metal Products;
 - (3) Fabricated Plate Work (Boiler Shops);
 - (4) Fabricated Structural Metal Manufacturing;
 - (5) Heating Equipment, except Electric;
 - (6) Industrial Machinery and Equipment Finishing Operations;
 - (7) Iron and Steel Forging;
 - (8) Primary Metal Products Manufacturing; and
 - (9) Valves and Pipe Fittings.
- (b) The provisions of this subpart apply to each new and existing affected source listed and defined in paragraphs (b)(1) through (5) of this section if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.
- (1) A dry abrasive blasting affected source is the collection of all equipment and activities necessary to perform dry abrasive blasting operations which use materials that contain MFHAP or that have the potential to emit MFHAP.

(2) A machining affected source is the collection of all equipment and activities necessary to perform machining operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or that have the potential to emit MFHAP.

(3) A dry grinding and dry polishing with machines affected source is the collection of all equipment and activities necessary to perform dry grinding and dry polishing with machines operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.

(4) A spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints which contain MFHAP. A spray painting affected source includes all equipment used to apply cleaning materials to a substrate to prepare it for paint application (surface preparation) or to remove dried paint; to apply a paint to a substrate (paint application) and to dry or cure the paint after application; or to clean paint operation equipment (equipment cleaning). Affected source(s) subject to the requirements of this paragraph are not subject to the miscellaneous surface coating provisions of subpart HHHHHH of this part, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources."

(5) A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.

- (c) An affected source is existing if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, before April 3, 2008.
- (d) An affected source is new if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, on or after April 3, 2008.
- (e) This subpart does not apply to research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air Act (CAA).
- (f) This subpart does not apply to tool or equipment repair operations, facility maintenance, or quality control activities as defined in §63.11522, "What definitions apply to this subpart?"
- (g) This subpart does not apply to operations performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.
- (h) This subpart does not apply to operations that produce military munitions, as defined in §63.11522, "What definitions apply to this subpart?", manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), or equipment directly and exclusively used for the purposes of transporting military munitions.
- (i) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

§63.11515 What are my compliance dates?

- (a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions in this subpart by July 25, 2011.
- (b) If you own or operate a new affected source, you must achieve compliance with the applicable provisions in this subpart by July 23, 2008, or upon startup of your affected source, whichever is later.

STANDARDS AND COMPLIANCE REQUIREMENTS

§63.11516 What are my standards and management practices?

- (a) *Dry abrasive blasting standards.* If you own or operate a new or existing dry abrasive blasting affected source, you must comply with the requirements in paragraphs (a)(1) through (3) of this section, as applicable, for each dry abrasive blasting operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when abrasive blasting operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

(1) *Standards for dry abrasive blasting of objects performed in totally enclosed and unvented blast chambers.* If you own or operate a new or existing dry abrasive blasting affected source which consists of an abrasive blasting chamber that is totally enclosed and unvented, as defined in §63.11522, "What definitions apply to this subpart?", you must implement management practices to minimize emissions of MFHAP. These management practices are the practices specified in paragraph (a)(1)(i) and (ii) of this section.

(i) You must minimize dust generation during emptying of abrasive blasting enclosures; and

(ii) You must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

(2) *Standards for dry abrasive blasting of objects performed in vented enclosures.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which has a vent allowing any air or blast material to escape, you must comply with the requirements in paragraphs (a)(2)(i) and (ii) of this section. Dry abrasive blasting operations for which the items to be blasted exceed 8 feet (2.4 meters) in any dimension, may be performed subject to the requirements in paragraph (a)(3) of this section.

(i) You must capture emissions and vent them to a filtration control device. You must operate the filtration control device according to manufacturer's instructions, and you must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in §63.11519(c)(4), "What are my notification, recordkeeping, and reporting requirements?"

(ii) You must implement the management practices to minimize emissions of MFHAP as specified in paragraphs (a)(2)(ii)(A) through (C) of this section.

(A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(B) You must enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and

(C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

(3) *Standards for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which is performed on objects greater than 8 feet (2.4 meters) in any one dimension, you may implement management practices to minimize emissions of MFHAP as specified in paragraph (a)(3)(i) of this section instead of the practices required by paragraph (a)(2) of this section. You must demonstrate that management practices are being implemented by complying with the requirements in paragraphs (a)(3)(ii) through (iv) of this section.

(i) Management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are specified in paragraphs (a)(3)(i)(A) through (E) of this section.

(A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(B) You must enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material; and

(C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions; and

(D) You must not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and

(E) Whenever practicable, you must switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide), where PM is a surrogate for MFHAP.

(ii) You must perform visual determinations of fugitive emissions, as specified in §63.11517(b), "What are my monitoring requirements?", according to paragraphs (a)(3)(ii)(A) or (B) of this section, as applicable.

(A) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, you must perform visual determinations of fugitive emissions at the fenceline or property border nearest to the outdoor dry abrasive blasting operation.

(B) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, you must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.

(iii) You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), "What are my notification, recordkeeping, and reporting requirements?"

(iv) If visible fugitive emissions are detected, you must perform corrective actions until the visible fugitive emissions are eliminated, at which time you must comply with the requirements in paragraphs (a)(3)(iv)(A) and (B) of this section.

(A) You must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements."

(B) You must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

- (b) *Standards for machining.* If you own or operate a new or existing machining affected source, you must implement management practices to minimize emissions of MFHAP as specified in paragraph (b)(1) and (2) of this section for each machining operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

(1) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(2) You must operate all equipment associated with machining according to manufacturer's instructions.

- (c) *Standards for dry grinding and dry polishing with machines.* If you own or operate a new or existing dry grinding and dry polishing with machines affected source, you must comply with the requirements of paragraphs (c)(1) and (2) of this section for each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when dry grinding and dry polishing operations

are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

(1) You must capture emissions and vent them to a filtration control device. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in §63.11519(c)(4), "Notification, recordkeeping, and reporting Requirements."

(2) You must implement management practices to minimize emissions of MFHAP as specified in paragraphs (c)(2)(i) and (ii) of this section.

(i) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;

(ii) You must operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.

(d) *Standards for control of MFHAP in spray painting.* If you own or operate a new or existing spray painting affected source, as defined in §63.11514 (b)(4), "Am I subject to this subpart?," you must implement the management practices in paragraphs (d)(1) through (9) of this section when a spray-applied paint that contains MFHAP is being applied. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied.

(1) *Standards for spray painting for MFHAP control.* All spray-applied painting of objects must meet the requirements of paragraphs (d)(1)(i) through (iii) of this section. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities, as described in Table 1, "Description of Source Categories Affected by this Subpart," or affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.

(i) Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.

(ii) All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.

(iii) You must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in §63.11519(c)(5), "Notification, recordkeeping, and reporting requirements."

(iv) As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (d)(1)(i) through (iii) of this section.

(2) *Standards for spray painting application equipment of all objects painted for MFHAP control.* All paints applied via spray-applied painting must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a

comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002", Revision 0 (incorporated by reference, see §63.14).

(3) *Spray system recordkeeping.* You must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in §63.11519(c)(7), "Notification, recordkeeping, and reporting requirements."

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

(5) *Spray painting worker certification.* All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (d)(6) of this section. The spray application of paint is prohibited by persons who are not certified as having completed the training described in paragraph (d)(6) of this section. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations.

(6) *Spray painting training program content.* Each owner or operator of an affected spray painting affected source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by paragraph (d)(5) of this section. The training program must include, at a minimum, the items listed in paragraphs (d)(6)(i) through (iii) of this section.

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

(ii) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (d)(6)(ii)(A) through (D) of this section.

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

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

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

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

(iii) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (d)(6)(ii) of this section are not required to provide the initial training required by that paragraph to these painters.

(7) *Records of spray painting training.* You must maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in §63.11519(c)(8), "Notification, recordkeeping, and reporting requirements."

(8) *Spray painting training dates.* As required by paragraph (d)(5) of this section, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the dates specified in paragraphs (d)(8)(i) and (ii) of this section.

(i) If your source is a new source, all personnel must be trained and certified no later than January 20, 2009, 180 days after startup, or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

(ii) If your source is an existing source, all personnel must be trained and certified no later than July 25, 2011, or 180 days after hiring, whichever is later. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

(9) *Duration of training validity.* Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years.

(e) [Reserved]

(f) *Standards for welding.* If you own or operate a new or existing welding affected source, you must comply with the requirements in paragraphs (f)(1) and (2) of this section for each welding operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. If your welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), you must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs (f)(3) through (8) of this section. The requirements in paragraphs (f)(1) through (8) of this section do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

(1) You must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in §63.11519(c)(4), "Notification, recordkeeping, and reporting requirements."

(2) You must implement one or more of the management practices specified in paragraphs (f)(2)(i) through (v) of this section to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.

(i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));

(ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;

(iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;

(iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and

(v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

(3) *Tier 1 compliance requirements for welding.* You must perform visual determinations of welding fugitive emissions as specified in §63.11517(b), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations. You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), "Notification, recordkeeping, and reporting requirements."

(4) *Requirements upon initial detection of visible emissions from welding.* If visible fugitive emissions are detected during any visual determination required in paragraph (f)(3) of this section, you must comply with the requirements in paragraphs (f)(4)(i) and (ii) of this section.

(i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section. After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.

(ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

(5) *Tier 2 requirements upon subsequent detection of visible emissions.* If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), you must comply with paragraphs (f)(5)(i) through (iv) of this section.

(i) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, you must conduct a visual determination of emissions opacity, as specified in §63.11517(c), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.

(ii) In lieu of the requirement of paragraph (f)(3) of this section to perform visual determinations of fugitive emissions with EPA Method 22, you must perform visual determinations of emissions opacity in accordance with §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(iii) You must keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, in accordance with the requirements in §63.11519(c)(3), "Notification, recordkeeping, and reporting requirements."

(iv) You must report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by §63.11519(b)(6), "Notification, recordkeeping, and reporting requirements."

(6) *Requirements for opacities less than or equal to 20 percent but greater than zero.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, you must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section.

(7) *Tier 3 requirements for opacities exceeding 20 percent.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded exceeds 20 percent, you must comply with the requirements in paragraphs (f)(7)(i) through (v) of this section.

(i) You must submit a report of exceedence of 20 percent opacity, along with your annual certification and compliance report, as specified in §63.11519(b)(8), "Notification, recordkeeping, and reporting requirements," and according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(ii) Within 30 days of the opacity exceedence, you must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (f)(8) of this section. If you have already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, you must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.

(iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, you must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(iv) You must maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (f)(7)(iii) of this section, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in §63.11519(b)(9), "Notification, recordkeeping, and reporting requirements."

(v) You must include these records in your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(8) *Site-Specific Welding Emissions Management Plan*. The Site-Specific Welding Emissions Management Plan must comply with the requirements in paragraphs (f)(8)(i) through (iii) of this section.

(i) Site-Specific Welding Emissions Management Plan must contain the information in paragraphs (f)(8)(i)(A) through (F) of this section.

(A) Company name and address;

(B) A list and description of all welding operations which currently comprise the welding affected source;

(C) A description of all management practices and/or fume control methods in place at the time of the opacity exceedence;

(D) A list and description of all management practices and/or fume control methods currently employed for the welding affected source;

(E) A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (f)(7)(ii) of this section, and the projected date of implementation; and

(F) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to paragraphs (f)(8)(i)(D) and (E) of this section.

(ii) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by paragraphs (f)(8)(i)(A) through (C) of this section, and submitted with your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(iii) You must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records in a readily-accessible location for inspector review, in accordance with the requirements in §63.11519(c)(12), "Notification, recordkeeping, and reporting requirements."

§63.11517 What are my monitoring requirements?

- (a) *Visual determination of fugitive emissions, general*. Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. You must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.
- (b) *Visual determination of fugitive emissions, graduated schedule*. Visual determinations of fugitive emissions must be performed in accordance with paragraph (a) of this section and according to the schedule in paragraphs (b)(1) through (4) of this section.

(1) *Daily Method 22 Testing.* Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.

(2) *Weekly Method 22 Testing.* If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (b)(1) of this section for 10 days of work day operation of the process, you may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, you must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (b)(1) of this section.

(3) *Monthly Method 22 Testing.* If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b)(2) of this section, you may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, you must resume weekly EPA Method 22 in accordance with paragraph (b)(2) of this section.

(4) *Quarterly Method 22 Testing.* If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (b)(3) of this section, you may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, you must resume monthly EPA Method 22 in accordance with paragraph (b)(3) of this section.

(c) *Visual determination of emissions opacity for welding Tier 2 or 3, general.* Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.

(d) *Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule.* You must perform visual determination of emissions opacity in accordance with paragraph (c) of this section and according to the schedule in paragraphs (d)(1) through (5) of this section.

(1) *Daily Method 9 testing for welding, Tier 2 or 3.* Perform visual determination of emissions opacity once per day during each day that the process is in operation.

(2) *Weekly Method 9 testing for welding, Tier 2 or 3.* If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (d)(1) of this section does not exceed 20 percent for 10 days of operation of the process, you may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, you must resume testing every day of operation of the process according to the requirements of paragraph (d)(1) of this section.

(3) *Monthly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(2) of this section does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, you must resume testing every five days of operation of the process according to the requirements of paragraph (d)(2) of this section.

(4) *Quarterly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent for three consecutive monthly tests, you may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, you must resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (d)(3) of this section.

(5) *Return to Method 22 testing for welding, Tier 2 or 3.* If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent, you may resume EPA Method 22 testing as

in paragraphs (b)(3) and (4) of this section. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with paragraphs (d)(3) and (4) of this section.

§63.11518 [Reserved]

§63.11519 What are my notification, recordkeeping, and reporting requirements?

- (a) *What notifications must I submit?—(1) Initial notification.* If you are the owner or operator of an area source in one of the nine metal fabrication and finishing source categories, as defined in §63.11514 “Am I subject to this subpart?,” you must submit the Initial Notification required by §63.9(b) “General Provisions,” for a new affected source no later than 120 days after initial startup or November 20, 2008, whichever is later. For an existing affected source, you must submit the Initial Notification no later than July 25, 2011. Your Initial Notification must provide the information specified in paragraphs (a)(1)(i) through (iv) of this section.

(i) The name, address, phone number and e-mail address of the owner and operator;

(ii) The address (physical location) of the affected source;

(iii) An identification of the relevant standard (i.e., this subpart); and

(iv) A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.

(2) *Notification of compliance status.* If you are the owner or operator of an existing affected source, you must submit a notification of compliance status on or before November 22, 2011. If you are the owner or operator of a new affected source, you must submit a notification of compliance status within 120 days after initial startup, or by November 20, 2008, whichever is later. You are required to submit the information specified in paragraphs (a)(2)(i) through (iv) of this section with your notification of compliance status:

(i) Your company's name and address;

(ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;

(iii) If you operate any spray painting affected sources, the information required by §63.11516(e)(3)(vi)(C), “Compliance demonstration,” or §63.11516(e)(4)(ix)(C), “Compliance demonstration,” as applicable; and

(iv) The date of the notification of compliance status.

- (b) *What reports must I prepare or submit?—(1) Annual certification and compliance reports.* You must prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (b)(2) through (7) of this section. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in paragraph (b)(3) of this section.

(2) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), “General Provisions,” you must prepare and submit each annual certification and compliance report according to the dates specified in paragraphs (b)(2)(i) through (iii) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.

(ii) Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.

(iii) Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.

(3) *Alternate dates.* For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, "Title V."

(i) If the permitting authority has established dates for submitting annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," you may prepare or submit, if required, the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (b)(2)(iii) of this section.

(ii) If an affected source prepares or submits an annual certification and compliance report pursuant to this section along with, or as part of, the monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," and the compliance report includes all required information concerning exceedences of any limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same exceedences in the annual monitoring report. However, submission of an annual certification and compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(4) *General requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(4)(i) through (iii) of this section, and the information specified in paragraphs (b)(5) through (7) of this section that is applicable to each affected source.

(i) Company name and address;

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(5) *Visual determination of fugitive emissions requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(5)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."

(i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;

(ii) A description of the corrective actions taken subsequent to the test; and

(iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

(6) *Visual determination of emissions opacity requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(6)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."

(i) The date of every visual determination of emissions opacity;

(ii) The average of the six-minute opacities measured by the test; and

(iii) A description of any corrective action taken subsequent to the test.

(7) [Reserved]

(8) *Exceedences of 20 percent opacity for welding affected sources.* As required by §63.11516(f)(7)(i), “Requirements for opacities exceeding 20 percent,” you must prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with your annual certification and compliance report according to the requirements in paragraph (b)(1) of this section, and must contain the information in paragraphs (b)(8)(iii)(A) and (B) of this section.

(A) The date on which the exceedence occurred; and

(B) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.

(9) *Site-specific Welding Emissions Management Plan reporting.* You must submit a copy of the records of daily visual determinations of emissions recorded in accordance with §63.11516(f)(7)(iv), “Tier 3 requirements for opacities exceeding 20 percent,” and a copy of your Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to §63.11516(f)(8), “Site-specific Welding Emission Management Plan,” along with your annual certification and compliance report, according to the requirements in paragraph (b)(1) of this section.

(c) *What records must I keep?* You must collect and keep records of the data and information specified in paragraphs (c)(1) through (13) of this section, according to the requirements in paragraph (c)(14) of this section.

(1) *General compliance and applicability records.* Maintain information specified in paragraphs (c)(1)(i) through (ii) of this section for each affected source.

(i) Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.

(ii) Records of the applicability determinations as in §63.11514(b)(1) through (5), “Am I subject to this subpart,” listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.

(2) *Visual determination of fugitive emissions records.* Maintain a record of the information specified in paragraphs (c)(2)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), “Monitoring requirements.”

(i) The date and results of every visual determination of fugitive emissions;

(ii) A description of any corrective action taken subsequent to the test; and

(iii) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.

(3) *Visual determination of emissions opacity records.* Maintain a record of the information specified in paragraphs (c)(3)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), “Monitoring requirements.”

(i) The date of every visual determination of emissions opacity; and

(ii) The average of the six-minute opacities measured by the test; and

(iii) A description of any corrective action taken subsequent to the test.

(4) Maintain a record of the manufacturer's specifications for the control devices used to comply with §63.11516, "What are my standards and management practices?"

(5) *Spray paint booth filter records.* Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with §63.11516(d)(1)(ii) and (iii), "Requirements for spray painting objects in spray booths or spray rooms."

(6) *Waterspray booth or water curtain efficiency tests.* Maintain a record of the water curtain efficiency demonstrations performed in accordance with §63.11516(d)(1)(ii), "Requirements for spray painting objects in spray booths or spray rooms."

(7) *HVLP or other high transfer efficiency spray delivery system documentation records.* Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems, in compliance with §63.11516(d)(3), "Requirements for spray painting of all objects." This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If you have obtained written approval for an alternative spray application system in accordance with §63.11516(d)(2), "Spray painting of all objects," you must maintain a record of that approval along with documentation of the demonstration of equivalency.

(8) *HVLP or other high transfer efficiency spray delivery system employee training documentation records.* Maintain certification that each worker performing spray painting operations has completed the training specified in §63.11516(d)(6), "Requirements for spray painting of all objects," with the date the initial training and the most recent refresher training was completed.

(9)-(10) [Reserved]

(11) *Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan.* You must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with §63.11516(f)(7)(iii), "Requirements for opacities exceeding 20 percent."

(12) *Site-Specific Welding Emissions Management Plan.* If you have been required to prepare a plan in accordance with §63.11516(f)(7)(iii), "Site-Specific Welding Emissions Management Plan," you must maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.

(13) *Manufacturer's instructions.* If you comply with this subpart by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review.

(14) *Welding Rod usage.* If you operate a new or existing welding affected source which is not required to comply with the requirements of §63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), you must maintain records demonstrating your welding rod usage on a rolling 12-month basis.

(15) Your records must be maintained according to the requirements in paragraphs (c)(14)(i) through (iii) of this section.

(i) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1), "General Provisions." Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(ii) As specified in §63.10(b)(1), "General Provisions," you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.

(iii) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1), "General Provisions." You may keep the records off-site for the remaining 3 years.

§63.11520 [Reserved]

OTHER REQUIREMENTS AND INFORMATION

§63.11521 Who implements and enforces this subpart?

- (a) This subpart can be implemented and enforced by EPA or a delegated authority such as your state, local, or tribal agency. If the EPA Administrator has delegated authority to your state, local, or tribal agency, then that agency, in addition to EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your state, local, or tribal agency.
- (b) In delegating implementation and enforcement authority of this subpart to a state, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the state, local, or tribal agency.
- (c) The authorities that cannot be delegated to state, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.
 - (1) Approval of an alternative non-opacity emissions standard under §63.6(g), of the General Provisions of this part.
 - (2) Approval of an alternative opacity emissions standard under §63.6(h)(9), of the General Provisions of this part.
 - (3) Approval of a major change to test methods under §63.7(e)(2)(ii) and (f), of the General Provisions of this part. A “major change to test method” is defined in §63.90.
 - (4) Approval of a major change to monitoring under §63.8(f), of the General Provisions of this part. A “major change to monitoring” under is defined in §63.90.
 - (5) Approval of a major change to recordkeeping and reporting under §63.10(f), of the General Provisions of this part. A “major change to recordkeeping/reporting” is defined in §63.90.

§63.11522 What definitions apply to this subpart?

The terms used in this subpart are defined in the CAA; and in this section as follows:

Adequate emission capture methods are hoods, enclosures, or any other duct intake devices with ductwork, dampers, manifolds, plenums, or fans designed to draw greater than 85 percent of the airborne dust generated from the process into the control device.

Capture system means the collection of components used to capture gases and fumes released from one or more emissions points and then convey the captured gas stream to a control device or to the atmosphere. A capture system may include, but is not limited to, the following components as applicable to a given capture system design: duct intake devices, hoods, enclosures, ductwork, dampers, manifolds, plenums, and fans.

Cartridge collector means a type of control device that uses perforated metal cartridges containing a pleated paper or non-woven fibrous filter media to remove PM from a gas stream by sieving and other mechanisms. Cartridge collectors can be designed with single use cartridges, which are removed and disposed after reaching capacity, or continuous use cartridges, which typically are cleaned by means of a pulse-jet mechanism.

Confined abrasive blasting enclosure means an enclosure that includes a roof and at least two complete walls, with side curtains and ventilation as needed to insure that no air or PM exits the enclosure while dry abrasive blasting is performed. Apertures or slots may be present in the roof or walls to allow for mechanized transport of the blasted objects with overhead cranes, or cable and cord entry into the dry abrasive blasting chamber.

Control device means equipment installed on a process vent or exhaust system that reduces the quantity of a pollutant that is emitted to the air.

Dry abrasive blasting means cleaning, polishing, conditioning, removing or preparing a surface by propelling a stream of abrasive material with compressed air against the surface. Hydroblasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions are not dry abrasive blasting.

Dry grinding and dry polishing with machines means grinding or polishing without the use of lubricating oils or fluids in fixed or stationary machines. Hand grinding, hand polishing, and bench top dry grinding and dry polishing are not included under this definition.

Fabric filter means a type of control device used for collecting PM by filtering a process exhaust stream through a filter or filter media; a fabric filter is also known as a baghouse.

Facility maintenance means operations performed as part of the routine repair or renovation of process equipment, machinery, control equipment, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. Facility maintenance also includes operations associated with the installation of new equipment or structures, and any processes as part of janitorial activities. Facility maintenance includes operations on stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Facility maintenance also includes operations performed on mobile equipment, such as fork trucks, that are used in a manufacturing facility and which are maintained in that same facility. Facility maintenance does not include spray-applied coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

Filtration control device means a control device that utilizes a filter to reduce the emissions of MFHAP and other PM.

Grinding means a process performed on a workpiece to remove undesirable material from the surface or to remove burrs or sharp edges. Grinding is done using belts, disks, or wheels consisting of or covered with various abrasives.

Machining means dry metal turning, milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering with machines. Shearing operations cut materials into a desired shape and size, while forming operations bend or conform materials into specific shapes. Cutting and shearing operations include punching, piercing, blanking, cutoff, parting, shearing and trimming. Forming operations include bending, forming, extruding, drawing, rolling, spinning, coining, and forging the metal. Processes specifically excluded are hand-held devices and any process employing fluids for lubrication or cooling.

Material containing MFHAP means a material containing one or more MFHAP. Any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing MFHAP.

Metal fabrication and finishing HAP (MFHAP) means any compound of the following metals: Cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form, with the exception of lead.

Metal fabrication and finishing source categories are limited to the nine metal fabrication and finishing source categories with the activities described in Table 1, "Description of Source Categories Affected by this Subpart." Metal fabrication or finishing operations means dry abrasive blasting, machining, spray painting, or welding in any one of the nine metal fabrication and finishing area source categories listed in Table 1, "Description of Source Categories Affected by this Subpart."

Military munitions means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the DoD, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: Confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD

components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

Paint means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, coatings, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered paints for the purposes of this subpart.

Polishing with machines means an operation which removes fine excess metal from a surface to prepare the surface for more refined finishing procedures prior to plating or other processes. Polishing may also be employed to remove burrs on castings or stampings. Polishing is performed using hard-faced wheels constructed of muslin, canvas, felt or leather, and typically employs natural or artificial abrasives. Polishing performed by hand without machines or in bench top operations are not considered polishing with machines for the purposes of this subpart.

Primarily engaged means the manufacturing, fabricating, or forging of one or more products listed in one of the nine metal fabrication and finishing source category descriptions in Table 1, "Description of Source Categories Affected by this Subpart," where this production represents at least 50 percent of the production at a facility, and where production quantities are established by the volume, linear foot, square foot, or other value suited to the specific industry. The period used to determine production should be the previous continuous 12 months of operation. Facilities must document and retain their rationale for the determination that their facility is not "primarily engaged" pursuant to §63.10(b)(3) of the General Provisions.

Quality control activities means operations that meet all of the following criteria:

- (1) The activities are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.
- (2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are not sold and do not leave the facility.
- (3) The activities are not a normal part of the operation;
- (4) The activities do not involve fabrication of tools, equipment, machinery, and structures that comprise the infrastructure of the facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

Responsible official means responsible official as defined in 40 CFR 70.2.

Spray-applied painting means application of paints using a hand-held device that creates an atomized mist of paint and deposits the paint on a substrate. For the purposes of this subpart, spray-applied painting does not include the following materials or activities:

- (1) Paints applied from a hand-held device with a paint cup capacity that is less than 3.0 fluid ounces (89 cubic centimeters).
- (2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.
- (3) Painting operations that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; the application of paints that contain fillers that adversely affect atomization with HVLP spray guns, and the application of paints that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

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

Spray booth or spray room means an enclosure with four sides and a roof where spray paint is prevented from leaving the booth during spraying by the enclosure. The roof of the spray booth or spray room may contain narrow slots for connecting the parts and products to overhead cranes, or for cord or cable entry into the spray booth or spray room.

Tool or equipment repair means equipment and devices used to repair or maintain process equipment or to prepare molds, dies, or other changeable elements of process equipment.

Totally enclosed and unvented means enclosed so that no air enters or leaves during operation.

Totally enclosed and unvented dry abrasive blasting chamber means a dry abrasive blasting enclosure which has no vents to the atmosphere, thus no emissions. A typical example of this sort of abrasive blasting enclosure is a small "glove box" enclosure, where the worker places their hands in openings or gloves that extend into the box and enable the worker to hold the objects as they are being blasted without allowing air and blast material to escape the box.

Vented dry abrasive blasting means dry abrasive blasting where the blast material is moved by air flow from within the chamber to outside the chamber into the atmosphere or into a control device.

Welding means a process which joins two metal parts by melting the parts at the joint and filling the space with molten metal.

Welding rod containing MFHAP means a welding rod that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or that contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the welding rod.

§63.11523 What General Provisions apply to this subpart?

The provisions in 40 CFR part 63, subpart A, applicable to sources subject to §63.11514(a) are specified in Table 2 of this subpart.

Table 1 to Subpart XXXXXX of Part 63—Description of Source Categories Affected by This Subpart

Metal fabrication and finishing source category	Description
Electrical and Electronic Equipment Finishing Operations	Establishments primarily engaged in manufacturing motors and generators; and electrical machinery, equipment, and supplies, not elsewhere classified. The electrical machinery equipment and supplies industry sector of this source category includes establishments primarily engaged in high energy particle acceleration systems and equipment, electronic simulators, appliance and extension cords, bells and chimes, insect traps, and other electrical equipment and supplies not elsewhere classified. The motors and generators sector of this source category includes establishments primarily engaged in manufacturing electric motors (except engine starting motors) and power generators; motor generator sets; railway motors and control equipment; and motors, generators and control equipment for gasoline, electric, and oil-electric buses and trucks.
Fabricated Metal Products	Establishments primarily engaged in manufacturing fabricated metal products, such as fire or burglary resistive steel safes and vaults and similar fire or burglary resistive products; and collapsible tubes of thin flexible metal. Also, establishments primarily engaged in manufacturing powder metallurgy products, metal boxes; metal ladders; metal household articles, such as ice cream freezers and ironing boards; and other fabricated metal products not elsewhere classified.

Fabricated Plate Work (Boiler Shops)	Establishments primarily engaged in manufacturing power marine boilers, pressure and nonpressure tanks, processing and storage vessels, heat exchangers, weldments and similar products.
Fabricated Structural Metal Manufacturing	Establishments primarily engaged in fabricating iron and steel or other metal for structural purposes, such as bridges, buildings, and sections for ships, boats, and barges.
Heating Equipment, except Electric	Establishments primarily engaged in manufacturing heating equipment, except electric and warm air furnaces, including gas, oil, and stoker coal fired equipment for the automatic utilization of gaseous, liquid, and solid fuels. Products produced in this source category include low-pressure heating (steam or hot water) boilers, fireplace inserts, domestic (steam or hot water) furnaces, domestic gas burners, gas room heaters, gas infrared heating units, combination gas-oil burners, oil or gas swimming pool heaters, heating apparatus (except electric or warm air), kerosene space heaters, gas fireplace logs, domestic and industrial oil burners, radiators (except electric), galvanized iron nonferrous metal range boilers, room heaters (except electric), coke and gas burning salamanders, liquid or gas solar energy collectors, solar heaters, space heaters (except electric), mechanical (domestic and industrial) stokers, wood and coal-burning stoves, domestic unit heaters (except electric), and wall heaters (except electric).
Industrial Machinery and Equipment Finishing Operations	Establishments primarily engaged in construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing. The construction machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing heavy machinery and equipment of types used primarily by the construction industries, such as bulldozers; concrete mixers; cranes, except industrial plant overhead and truck-type cranes; dredging machinery; pavers; and power shovels. Also establishments primarily engaged in manufacturing forestry equipment and certain specialized equipment, not elsewhere classified, similar to that used by the construction industries, such as elevating platforms, ship cranes, and capstans, aerial work platforms, and automobile wrecker hoists. The oil and gas field machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing machinery and equipment for use in oil and gas fields or for drilling water wells, including portable drilling rigs. The pumps and pumping equipment manufacturing sector of this source category includes establishments primarily engaged in manufacturing pumps and pumping equipment for general industrial, commercial, or household use, except fluid power pumps and motors. This category includes establishments primarily engaged in manufacturing domestic water and sump pumps.
Iron and Steel Forging	Establishments primarily engaged in the forging manufacturing process, where purchased iron and steel metal is pressed, pounded or squeezed under great pressure into high strength parts known as forgings. The forging process is different from the casting and foundry processes, as metal used to make forged parts is never melted and poured.
Primary Metals Products Manufacturing	Establishments primarily engaged in manufacturing products such as fabricated wire products (except springs) made from purchased wire. These facilities also manufacture steel balls; nonferrous metal brads and nails; nonferrous metal spikes, staples, and tacks; and other primary metals products not elsewhere classified.
Valves and Pipe Fittings	Establishments primarily engaged in manufacturing metal valves and pipe fittings; flanges; unions, with the exception of purchased pipes; and other valves and pipe fittings not elsewhere classified.

Table 2 to Subpart XXXXXX of Part 63—Applicability of General Provisions to Metal Fabrication or Finishing Area Sources

Instructions for Table 2—As required in §63.11523, “General Provisions Requirements,” you must meet each requirement in the following table that applies to you.

Citation	Subject
63.1 ¹	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.5	Construction/reconstruction.
63.6(a), (b)(1)-(b)(5), (c)(1), (c)(2), (c)(5), (g), (i), (j)	Compliance with standards and maintenance requirements.
63.9(a)-(d)	Notification requirements.
63.10(a), (b) except for (b)(2), (d)(1), (d)(4)	Recordkeeping and reporting.
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality.
63.16	Performance track provisions.

¹§63.11514(g), “Am I subject to this subpart?” exempts affected sources from the obligation to obtain title V operating permits.

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

**Technical Support Document (TSD) for a
Minor Source Operating Permit (MSOP) Transitioning to a
Federally Enforceable State Operating Permit (FESOP) with
New Source Review (NSR)**

Source Description and Location
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Source Name:	Kennedy Tank & Manufacturing Co., Inc.
Source Location:	833 East Sumner Ave, Indianapolis, IN 46227
County:	Marion (Perry Township)
SIC Code:	3443 (Fabricated Plate Work)
Operation Permit No.:	F 097-33787-00554
Permit Reviewer:	Tamera Wessel

On October 16, 2013, the Office of Air Quality (OAQ) received an application from Kennedy Tank & Manufacturing Co., Inc. related to the construction and operation of new emission units at an existing tank manufacturing facility and transition from a MSOP to a FESOP with New Source Review.

Existing Approvals

The source has been operating under MSOP No. M097-20357-00554, issued on May 28, 2008.

There have been no other approvals since that time.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Non-attainment effective October 4, 2013, for the Center, Perry, and Wayne Twp. The remainder of Marion County is unclassifiable or attainment effective.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation 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. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Marion County has been classified as attainment for PM_{2.5}. 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. See the State Rule Applicability – Entire Source section.
- (c) **SO₂**
U.S. EPA, in the Federal Register Notice 78 FR 47191 dated August 5, 2013, has designated Marion County Perry Township as nonattainment for SO₂. Therefore, SO₂ emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (d) **Other Criteria Pollutants**
Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Kennedy Tank & Manufacturing, Inc. on January 14, 2013, relating to the renewal of their MSOP, the addition of welding units, and to include an unpermitted paint booth to their stationary tank manufacturing facility. Due to the inclusion of the additional emissions equipment, an evaluation of the source's potential emissions revealed they would no longer qualify for a minor source operating permit. Therefore, on October 16, 2013, Kennedy Tank & Manufacturing, Inc. submitted an application to transition from a MSOP to a FESOP.

The MSOP Renewal application has been combined into the application for a FESOP with New Source Review.

Additional information was provided on April 29, 2014 and March 17, 2014 requesting the inclusion of a plasma cutting table, a fiberglass gel application process, and a degreasing operation.

The source consists of the following permitted emission units:

- (a) One (1) paint spray booth, identified as PB1, constructed in 1991, utilizing an airless and air-assisted airless system, using 0.0084 gallons of coating per square foot at a rate of 1,480 square feet per hour, using a dry filter for particulate matter overspray control and exhausting to stack 1 identified as ST1.

- (b) One (1) stationary dry sandblasting operation, blasting structural steel, with a nozzle pressure of one hundred (100) pounds per square inch (psi), and an internal nozzle diameter of 0.50 inches with a dust collector, constructed August 31, 1991, and exhausting indoors.

This is an affected facility under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63, Subpart XXXXXX.

- (c) The following equipment related to welding activities resulting in the emission of HAPs, PM and PM 10:

- (1) Four (4) stations utilizing Submerged Arc
- (2) Twenty (20) stations utilizing Metal Inert Gas (MIG)(carbon steel)
- (3) Six (6) stations utilizing Tungsten Inert Gas (TIG)(carbon steel)

These are affected facilities under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

- (d) Twenty-four (24) natural gas-fired heaters, identified as SH1 through SH24, with a combined total heat input of 3.5 million Btu per hour.

The following is a list of the new emission units:

- (a) The following equipment related to welding activities resulting in the emission of HAPs, PM and PM10:

- (1) Fifteen (15) stations utilizing Metal Inert Gas (MIG)(carbon steel), approved for construction in 2014.

These are affected facilities under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission unit:

- (a) One (1) paint spray booth, identified as PB2, constructed in 1991, utilizing an airless and air-assisted airless system, using 0.0084 gallons of coating per square foot at a rate of 1,480 square feet per hour, using a dry filter for particulate matter overspray control and exhausting to stack 2, identified as ST2.
- (b) One (1) fiberglass gel application process, identified as FG6, constructed in 1991, with a maximum production rate of 0.13 tanks per hour, using a dry filter for particulate matter control, and exhausting to stack ST6.

- (c) One (1) plasma cutting table, identified as PT8, constructed in 2000, with no add-on control, a maximum production rate of 7.92 cubic inches removed per minute, and exhausting indoors.

This is an affected facility under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

- (d) One (1) degreaser operation that does not exceed one hundred forty-five (145) gallons per twelve (12) months.

Enforcement Issues

IDEM is aware that equipment has been constructed 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 – FESOP

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

Pollutant	Potential To Emit (tons/year)
PM	>250
PM ₁₀ ⁽¹⁾	>250
PM _{2.5} ⁽¹⁾	>250
SO ₂	<100
NO _x	<100
VOC	>250
CO	<100
GHGs as CO ₂ e	<100,000

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

HAPs	Potential To Emit (tons/year)
Single HAP	>10
Total HAPs	>25

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM₁₀, PM_{2.5}, and VOC are each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) 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.

PTE of the Entire Source After Issuance of the FESOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Natural Gas-fired Heaters	0.03	0.12	0.12	0.01	1.53	0.08	1.29	1,851	0.03	0.03 Hexane
Blasting Operations	35.39	30.48	30.48	0	0	0	0	0	0.02	0.02 Manganese
Paint Spray Booth PB1	22.76	22.76	22.76	0	0	<98.00 ***	0	0	<17.00	<9.50 Toluene or Styrene
Paint Spray Booth PB2	22.76	22.76	22.76	0	0		0	0		
Fiberglass Gel Application Process FG6	7.11	7.11	7.11	0	0		0	0		
Plasma Table PT8	4.74	4.74	4.74	0	0	0	0	0	5.95	3.60 Nickel
Welding Activities	5.97	5.97	5.97	0	0	0	0	0	1.22	1.22 Manganese
Degreaser DG7	0	0	0	0	0	0.49	0	0	negl.	negl.
Fugitive Emissions	0.92	0.22	0.03	0	0	0	0	0	0	0
Total PTE of Entire Source	99.77	94.16	93.97	0.01	1.53	98.57	1.29	1,851	24.66	9.50
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	NA	250	250	250	100,000	NA	NA
Emission Offset Major Source Thresholds	NA	NA	NA	100	NA	NA	NA	NA	NA	NA
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 CO ₂ 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. *** In order to render the requirements of 326 IAC 8-1-6 not applicable, the total input of volatile organic compounds (VOCs) delivered to the fiberglass gel application process (FG6) shall not exceed twenty-four (24.00) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.										

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR

63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the source shall comply with the following:

- (1) The PM₁₀ emissions (after control) from the sandblasting operation shall not exceed 6.96 pounds per hour (lbs/hr).
- (2) The PM_{2.5} emissions (after control) from the sandblasting operation shall not exceed 6.96 pounds per hour (lbs/hr).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) not applicable, the Permittee shall comply with the following:

- (3) The total input of volatile organic compounds (VOCs) delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass gel application process (FG-6) shall not exceed ninety-eight (98.00) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (4) The total input of any single HAP delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass gel application process (FG-6) shall not exceed nine and five tenths (9.50) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (5) The total input of combined HAPs delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass gel application process (FG-6) shall not exceed seventeen (17.00) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM₁₀, PM_{2.5}, VOC, and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM₁₀, PM_{2.5}, and VOC to less than one hundred (100) tons per twelve (12) consecutive month period, each, any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potentials to emit PM, PM_{2.5}, PM₁₀, and VOC are limited to less than 250 tons per year, the potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). The potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

- (1) The PM emissions (after control) from the sandblasting operation, SB3, shall not exceed 8.10 pounds per hour (lbs/hr).

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) Emission Offset Minor Source

This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit SO₂ is less than 100 tons per year and the potential to emit all nonattainment regulated pollutants are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories (40 CFR Part 63, Subpart XXXXXX (6X)) since it is an area source of HAP emissions, primarily engaged in the operations in one of the nine source categories listed in 40 CFR 63.11514(a)(1) through (a)(9), and has the potential to emit metal HAP (MFHAP). The source processes materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data.

The emission units subject to this rule include the following:

- (1) One (1) plasma cutting table, identified as PT8, constructed in 2000, with no add-on control, a maximum production rate of 7.92 cubic inches removed per minute, and exhausting indoors.

This is an affected facility under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

- (2) One (1) stationary dry sandblasting operation, blasting structural steel, with a nozzle pressure of one hundred (100) pounds per square inch (psi), and an internal nozzle diameter of 0.375 inches with a dust collector, constructed August 31, 1991, and exhausting indoors.

This is an affected facility under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

- (3) The following equipment related to welding activities resulting in the emission of HAPs, PM and PM 10:

- (1) Four (4) stations utilizing Submerged Arc
- (2) Thirty-five (35) stations utilizing Metal Inert Gas (MIG)(carbon steel)
- (3) Six (6) stations utilizing Tungsten Inert Gas (TIG)(carbon steel)

These are affected facilities under the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source

Categories, 40 CFR 63, Subpart XXXXXX.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11514(a)(3) and (b)(1), (5), (c), (i)
- (2) 40 CFR 63.11515(a)
- (3) 40 CFR 63.11516(a)(3), (b) and (f)
- (4) 40 CFR 63.11517
- (5) 40 CFR 63.11519(a)(1)(i), (ii), (iii), (iv), (a)(2)(i), (ii), (iv)
- (6) 40 CFR 63.11519(b)(1), (2), (4), (5), (6), (8), (9)
- (7) 40 CFR 63.11519(c)(1), (2), (3), (4), (11), (12), (13), (14), (15)
- (8) 40 CFR 63.11521
- (9) 40 CFR 63.11522
- (10) 40 CFR 63.11523
- (11) Table 1 to 40 CFR 63 Subpart XXXXXX
- (12) Table 2 to 40 CFR 63 Subpart XXXXXX

This is a new requirement in the permit and this NESHAP contains applicable testing requirements. This is a Title I change.

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart XXXXXX.

- (c) The requirements of 40 CFR 63, Subpart MMMM, National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts (326 IAC 20-80) are not included in this permit because this source is not located at a source that is major for HAP.
- (d) The requirements of 40 CFR 63, Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources are not included in this permit because this source does not use coatings that contain target HAP's nor does the source perform paint stripping using MeCl for the removal of dried paint.
- (e) The requirements of 40 CFR 63, Subpart WWWW National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, are not included in this permit because this source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted, such that the potential to emit of any single HAP is limited to less than 10 tons per year and the potential to emit of any combination of HAPs is limited to less than 25 tons per year. Therefore the source is not a major source of HAP.
- (f) 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)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the source is greater than ten (10) tons per year for any single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the source to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (d) 326 IAC 2-6 (Emission Reporting)
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.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, since it has potential fugitive particulate emissions less than 25 tons per year.
- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Paint Spray Booths

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3 shall not apply if a more stringent limit under 326 IAC 6.5 has been established. The particulate emissions from the paint booths are subject to a more stringent limit in 326 IAC 6.5. Therefore, the requirements of 326 IAC 6-3 are not applicable.

326 IAC 6.5 (Particulate Emission Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(h), the surface coating operations shall comply with the following, since they each use greater than five (5) gallons of coating per day:

- (a) Particulate from the paint spray booths shall be controlled by a dry particulate filter, or an equivalent control device, subject to the following:
 - (1) The Permittee shall operate the control device in accordance with manufacturer's specifications.

Note: This is a change in requirements. This is a Title I change.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Pursuant to 326 IAC 8-1-6(3)(A), the requirements of 326 8-1-6 are not applicable to the two (2) paint spray booths, since each is regulated by the provision of 326 IAC 8-2-9.

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

This source is subject to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations), because it coats metal parts under the Standard Industrial Classification Code of major group #34. The source uses air dried application and it does not apply extreme performance coatings.

- (1) Pursuant to 326 IAC 8-2-9(c)(2), no owner or operator of this source shall cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three (3.5) pounds per gallon of coating, excluding water. This operation shall use daily weighted averaging to comply with this rule.

All solvents sprayed from the application equipment of Spray Paint Booth during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum (U)]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

- (2) Pursuant to 326 IAC 8-2-9(d)(2), one (1) or a combination of the following equipment shall be used for coating application:
 - (A) Electrostatic equipment.
 - (B) High volume low-pressure (HVLP) spray equipment.
 - (C) Flow coating.
 - (D) Roller coating.
 - (E) Dip coating, including electrodeposition.
 - (F) Airless spray.
 - (G) Air-assisted airless spray.
 - (H) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

This source currently uses an airless and air-assisted airless spray system.

- (3) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions

from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (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.

Fiberglass Gel Application Process

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3 shall not apply if a more stringent limit under 326 IAC 6.5 has been established. The particulate emissions from the paint booths are subject to a more stringent limit in 326 IAC 6.5. Therefore, the requirements of 326 IAC 6-3 are not applicable.

326 IAC 6.5 (Particulate Emission Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(h), the reinforced plastic composite fabricating manufacturing process shall comply with the following, since they each use greater than five (5) gallons of coating per day:

- (a) Particulate from the fiberglass gel application process shall be controlled by a dry particulate filter, or an equivalent control device, subject to the following:
 - (1) The Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

In order to render the requirements of 326 IAC 8-1-6 not applicable, the total input of volatile organic compounds (VOCs) delivered to the fiberglass gel application process (FG6) shall not exceed twenty-four (24.00) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit VOC from the fiberglass gel application process (FG6) to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

Plasma Table

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3 shall not apply if a more stringent limit under 326 IAC 6.5 has been established. The particulate emissions from the plasma table are subject to a more stringent limit in 326 IAC 6.5. Therefore, the requirements of 326 IAC 6-3 are not applicable.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the plasma table shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Blasting

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the sandblasting operation shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Note: This is a change in requirements. This is a Title I change.

Space Heating Units

326 6-2-4 (Particulate Matter Limitations for Sources of Indirect Heating)

Pursuant to 326 6-2-4 (Particulate Matter Limitations for Sources of Indirect Heating) particulate emissions from the twenty four (24) natural gas-fired space heaters, identified as SH1 through SH24, are not subject to 362 IAC 6-2-4 because they are not sources of indirect heating.

326 IAC 6-3 (Particulate Emissions Limitations)

The natural gas-fired and diesel-fired heaters are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired and diesel-fired heaters are also exempt from the requirements of 326 IAC 6-3, because they have potential particulate emissions of less than five hundred fifty one thousandths (0.551) pound per hour, each.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the natural gas-fired space heaters (SH1 through SH24) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Note: This is a new requirement. This is a Title I change.

326 IAC 7-1.1-1 (Sulfur Dioxide Emissions Limitations)

The requirements of 326 IAC 7-1.1-1 (Sulfur Dioxide Emissions Limitations) does not apply because each natural gas-fired space heater does not have the potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

326 IAC 9-1-1 (Carbon Monoxide Emission Limits)

The natural gas-fired combustion units are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there are no applicable emission limits for the source under 326 IAC 9-1-2.

326 IAC 10-1-1 (Nitrogen Oxides Control)

The natural gas-fired combustion units are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

Welding

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3 shall not apply if a more stringent limit under 326 IAC 6.5 has been established. The particulate emissions from the welding activities are subject to a more stringent limit in 326 IAC 6.5. Therefore, the requirements of 326 IAC 6-3 are not applicable.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the welding activities shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Note: This is a change in requirements. This is a Title I change.

Degreaser

326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements)

Pursuant to 326 IAC 8-3-1(a)(2), the requirements of 326 IAC 8-3-2 apply to the cold cleaner degreaser without a remote solvent reservoir that was installed in 1982.

Pursuant to 326 IAC 8-3-2(a), the owner or operator of the cold cleaning facility shall:

- (a) Equip the cleaner with a cover,
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the degreaser;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (c), (d), (f), and (g);
- (f) Store waste solvent only in closed containers.
- (g) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:

- (a) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (2) A water cover when solvent used is insoluble in, and heavier than, water.
 - (3) A refrigerated chiller.
 - (4) Carbon adsorption.

- (5) An alternative system of demonstrated equivalent or better control as those outlined in clauses (1) through (4) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (b) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (c) If used, solvent spray:
 - (i) must be a solid, fluid stream; and
 - (ii) shall be applied at a pressure that does not cause excessive splashing.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)

Pursuant to 326 IAC 8-3-8, on and after January 1, 2015, cold cleaner degreasers at the source are subject to the following:

- (a) Pursuant to 326 IAC 8-3-8(b)(2), no person shall operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Pursuant to 326 IAC 8-3-8(c)(2), the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Pursuant to 326 IAC 8-3-8(d), these records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

Compliance Determination, Monitoring and Testing Requirements
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- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency	Range	Excursions and Exceedances
Paint Spray Booths (PB1, PB2) and Fiberglass Gel Application Process (FG6) / Dry Filters	Integrity and Particulate Loading Inspections	Daily	Normal or Abnormal	Response Steps
	Overspray Observations	Weekly	Presence of overspray	
	Overspray Observations	Monthly	Noticeable change or presence of overspray on rooftop or on ground nearby	
Sandblasting Operation / Dust Collector	Water Pressure Drop	Daily	0.5 to 6 inches	Response Steps

- (b) There are no testing requirements applicable to this source.

Note: The sandblasting operation is able to meet the lb/hr PSD avoidance limits with the use of a control device having a control efficiency of 75% or greater. The dust collector controlling the sandblasting operation has a control efficiency of 99%; therefore, a condition requiring testing to demonstrate compliance with the particulate matter limitations will not be required for the sandblasting operation.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. Applications for the purpose of this review were received on January 14, 2013 and October 16, 2013. Additional information was received on March 5, 2014, March 17, 2014, and April 29, 2014.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. F097-33787-00554. The staff recommends to the Commissioner that this New Source Review and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Tamera Wessel 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) 834-8530 or toll free at 1-800-451-6027 extension 4-8530.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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

Company Name: Kennedy Tank and Manufacturing Company Incorporated
Address City IN Zip: 833 East Sumner Ave. Indianapolis IN 46227
Permit Number: F097-33787-00554
Plt ID: 097-00554
Reviewer: Tamera Wessel
Date: 1/14/2013

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.5

30.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.03	0.12	0.12	9.20E-03	1.53	0.08	1.29

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.219E-05	1.840E-05	1.150E-03	0.03	5.212E-05	0.03

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	7.665E-06	1.686E-05	2.146E-05	5.825E-06	3.219E-05	8.401E-05
					Total HAPs	0.03
					Worst HAP	0.03

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

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1,840	0.0	0.0
Summed Potential Emissions in tons/yr	1,840		
CO2e Total in tons/yr	1,851		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

Appendix A: Emission Calculations
Abrasive Blasting - Confined

Page 2 of 12 TSD App A

Company Name: Kennedy Tank and Manufacturing Company Incorporated
Address City IN Zip: 833 East Sumner Ave. Indianapolis IN 46227
Permit Number: F097-33787-00554
Reviewer: Tamera Wessel
Date: 1/14/2013

Table 1 - Emission Factors for Abrasives

	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Abrasive		
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - HAPs Content and Emissions

HAP	% by Weight
Manganese	1.3%

Potential to Emit Before Control					
FR = Flow rate of actual abrasive (lb/hr) =	2024.00	lb/hr (per nozzle)			
w = fraction of time of wet blasting =	0	%			
N = number of nozzles =	4				
EF = PM emission factor for actual abrasive from Table 1 =	0.004	lb PM/ lb abrasive			
PM10 emission factor ratio for actual abrasive from Table 1 =	0.86	lb PM10 / lb PM			
			PM	PM10	PM2.5
Potential to Emit (before control) =	32.38		27.85	27.85	0.42
=	777.22		668.41	668.41	10.10
=	141.84		121.98	121.98	1.84
					ton/yr
Potential to Emit After Control					
			PM	PM10	PM2.5
Emission Control Device Efficiency =	99.0%		99.0%	99.0%	99.0%
Potential to Emit (after control) =	0.32		0.28	0.28	0.00
=	7.77		6.68	6.68	0.10
=	1.42		1.22	1.22	0.02
					ton/yr
Limited Potential to Emit After Control					
			PM	PM10	PM2.5
Limited Potential to Emit =	8.10		6.96	6.96	0.11
=	194.40		167.04	167.04	2.53
=	35.48		30.48	30.48	0.46
					ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

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

Company Name: Kennedy Tank and Manufacturing Company Incorporated
Source Address: 833 East Sumner Ave. Indianapolis IN 46227
Permit Number: F097-33787-00554
Reviewer: Tamera Wessel
Date: January 14, 2013

Emission Unit	Material	Density (Lb/Gal)	Lb VOC/gal applied coating	Gal of Mat. (gal/ft ²)	Maximum (ft ² /hr)	Maximum (ft ² /day)	Potential VOC (lbs/hr)	Potential VOC (tons/year)	PM/PM10/PM2.5 Potential before Controls (ton/yr)	Dry filter Control Efficiency (%)	PM/PM10/PM2.5 Potential after Controls (tons/yr)	Transfer Efficiency
PB1/PB2	E350 EPOXY Primer	12.23	3.50	0.0084	1,480	35,520	43.75	191.63	119.49	90.4%	11.47	0.75
	Carbozinc 11	21.32	4.00	0.0084	1,480	35,520	50.00	219.00	237.07	90.4%	22.76	0.75
	Bitumastic 300 M	10.67	1.86	0.0084	1,480	35,520	23.25	101.84	120.59	90.4%	11.58	0.75
	Chemthane 3107 A	10.84	3.00	0.0084	1,480	35,520	37.50	164.25	107.31	90.4%	10.30	0.75
	Interthane 990	10.10	3.50	0.0084	1,480	35,520	43.75	191.63	90.34	90.4%	8.67	0.75
	Interthane 226	15.50	0.00	0.0084	1,480	35,520	0.00	0.00	212.16	90.4%	20.37	0.75
	Plasite 7122	10.26	3.50	0.0084	1,480	35,520	43.75	191.63	92.53	90.4%	8.88	0.75
	Worst Case Coating	21.32	4.00	0.0084	1,480	35,520	50.00	219.00	237.07	90.4%	22.76	0.75
	Material	Density (Lb/Gal)	Lb VOC/gal applied coating	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Maximum (unit/day)	Potential VOC (lbs/hr)	Potential VOC (tons/year)	PM/PM10/PM2.5 Potential before Controls (ton/yr)	Dry filter Control Efficiency (%)	PM/PM10/PM2.5 Potential after Controls (tons/yr)	Transfer Efficiency
	Solvent (MEK)	6.70	6.70	0.40	0.21	5.00	0.56	2.47	0.00	90.4%	0.00	0.75
Emissions per Paint Booth							50.56	221.47	237.07		22.76	
Total Emissions for coating operation (tons/yr)								442.94	474.14		45.52	

Methodology:

ft²/day = ft²/hr * 24hr/day

units/day = units/hr * 24 hr/day

Potential VOC (lbs/hr) = Lb VOC/gal coating applied * gal applied/ft² (or unit) * ft² (or unit)/hr

Potential VOC (tons/yr) = Potential VOC (lbs/hr) * (8760 hrs/yr) / (2000 lbs/ton)

PM/PM10/PM2.5 Potential before controls (tons/yr) = (density - Lb VOC/gal coating applied) * (1- transfer efficiency) * (gal applied/ft² (or unit)) * (ft² (or units)/hr) * (8760 hrs/yr) / (2000 lbs/ton)

PM/PM10/PM2.5 Potential after controls (tons/yr) = PM/PM10/PM2.5 Potential before controls (tons/yr) * (1- control efficiency)

Emissions per Paint Booth = Worst Case Coating + Solvent (MEK)

Total Emissions for Coating Operation (tons/yr) = Emissions per Paint Booth * 2

Appendix A: Emission Calculations
HAP Emission Calculations (PB1 & PB2)

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Company Name: Kennedy Tank and Manufacturing Company Incorporated
Address City IN Zip: 833 East Sumner Ave., Indianapolis IN 46227
Permit Number: F097-33787-00554
Permit Reviewer: Tamera Wessel
Date: 1/14/2013

Emission Unit	Material	Density (Lb/Gal)	Xylene 1330207 (lbs/gal of mixture)	Meta-Xylene 108-38-3 (lbs/gal of mixture)	Para-Xylene 106-42-3 (lbs/gal of mixture)	Ortho-Xylene 95-47-6 (lbs/gal of mixture)	Toluene 108883 (lbs/gal of mixture)	Ethylbenzene 100414 (lbs/gal of mixture)	Methanol 67561 (lbs/gal of mixture)	Methyl Isobutyl Ketone 108101 (lbs/gal of mixture)	Gal of Mat. (gal/ft ²)	Maximum (ft ² /hr)	Maximum (ft ² /day)	Xylene (lbs/hr)	Meta-Xylene (lbs/hr)	Para-Xylene (lbs/hr)	Ortho-Xylene (lbs/hr)	Toluene (lbs/hr)	Ethylbenzene (lbs/hr)	Methanol (lbs/hr)	Methyl Isobutyl Ketone (lbs/hr)	Combined HAP's (lbs/hr)
PB1/PB2	E350 EPOXY Primer	12.23	0.13	0.00	0.00	0.00	0.00	0.03	0.60	0.00	0.0084	1,480	35,520	1.63	0.00	0.00	0.00	0.00	0.38	7.50	0.00	9.50
	Carbozinc 11	21.32	0	0.04	0.02	0.01	0.00	0.02	0.00	0.00	0.0084	1,480	35,520	0.00	0.50	0.25	0.13	0.00	0.25	0.00	0.00	1.13
	Bitumastic 300 M	10.67	0	0.82	0.36	0.26	0.01	0.34	0.00	0.00	0.0084	1,480	35,520	0.00	10.25	4.50	3.25	0.13	4.25	0.00	0.00	22.38
	Chemthane 3107 A	10.84	0.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0084	1,480	35,520	9.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.00
	Interthane 990	10.10	1.01	0.00	0.00	0.00	0.00	1.01	0.00	0.00	0.0084	1,480	35,520	12.63	0.00	0.00	0.00	0.00	12.63	0.00	0.00	25.25
	Interthane 226	15.50	1.55	0.00	0.00	0.00	0.00	1.55	0.00	0.00	0.0084	1,480	35,520	19.38	0.00	0.00	0.00	0.00	19.38	0.00	0.00	38.75
	Plasite 7122	10.26	0	0.95	0.47	0.47	2.05	0.47	0.00	0.47	0.0084	1,480	35,520	0.00	11.88	5.88	5.88	25.63	5.88	0.00	5.88	61.00
	Worst Case Coating	21.32	1.55	0.95	0.47	0.47	2.05	1.55	0.60	0.47	0.0084	1,480	35,520	19.38	11.88	5.88	5.88	25.63	19.38	7.50	5.88	61.00
Total Emissions per Booth (PB1/PB2) (lbs/hr)														19.38	11.88	5.88	5.88	25.63	19.38	7.50	5.88	61.00

Potential HAP Emissions tons/year
Solvent (MEK) contains no HAPs.

Total Emissions per Booth (PB1/PB2) (tons/yr)
Total Emissions for coating operation (tons/yr)

84.86	52.01	25.73	25.73	112.24	84.86	32.85	25.73	267.19
169.73	104.03	51.47	51.47	224.48	169.73	65.70	51.47	534.37

Methodology:

ft²/day = ft²/hr * 24hr/day

Potential HAP (lbs/hr) = lb VOC/gal of mixture * gal applied/unit * units/hr

Potential VOC (tons/yr) = Potential VOC (lbs/hr) * (8760 hrs/yr) / (2000 lbs/ton)

Appendix A: Emissions Calculations
VOC & PM Emission Calculations
Fiberglass Operation

Company Name: Kennedy Tank and Manufacturing Company Incorporated
Address City IN Zip: 833 East Sumner Ave. Indianapolis IN 46227
Permit Number: F097-33787-00554
Reviewer: Tamera Wessel
Date: January 14, 2013

Emission Unit	Material	Density (Lb/Gal)	VOC wt%	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Potential VOC (lbs/hr)	Potential VOC (tons/year)	PM/PM10/P M2.5* Potential before Controls (ton/yr)	PM10 Potential before Controls (ton/yr)	PM/PM10/P M2.5* Potential after Controls (tons/yr)	PM10 Potential after Controls (tons/yr)
FG6	Luperox DDM-9 (curing agent)	8.42	0%	0.5000	0.125	0.00	0.00	0.58	0.58	0.06	0.06
	Polylite 33480-02 (resin)	9.35	48%	110.50	0.125	21.44	93.90	73.52	73.52	7.06	7.06
Total Emissions						21.44	93.90	74.09	74.09	7.11	7.11

Methodology:

unit = tanks coated

Potential VOC (lb/hr) = styrene emissions using United Emission Factor (per company representative all VOCs in PolyLite 33480-02 are styrene)

Potential VOC (ton/year) = Potential VOC (lb/hr) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)

Potential PM before controls (ton/year) = Density * (1 - VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)

Potential PM after controls (ton/year) = Potential PM before controls (tons/yr) * (1 - control efficiency)

*PM=PM10=PM2.5

**Appendix A: Emissions Calculations
HAP Emission Calculations
Fiberglass Operation**

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**Company Name: Kennedy Tank and Manufacturing Company Incorporated
Address City IN Zip: 833 East Sumner Ave. Indianapolis IN 46227
Permit Number: F097-33787-00554
Reviewer: Tamera Wessel
Date: January 14, 2013**

Emission Unit	Material (Resin Name)	Density (Lb/Gal)	Weight % Styrene	Cobalt Compounds (% by Weight)	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs styrene/ ton resin processed)	Potential Styrene (lbs/hr)	Potential Styrene (tons/year)	Potential Cobalt Compound s (lbs/hr)	Potential Cobalt Compounds (tons/year)	Combined HAP's (tons/year)	Transfer Efficiency
FG6	Polylite 33480-02 (resin)	9.35	48%	0.25%	110.5	0.125	332	21.44	93.90	0.08	0.35	94.25	0.75

Methodology:

Emission factors based on the worst case type of application from "Unified Emission Factors (UEF) for Open Molding of Composites," Composites Fabricators Association (October 2009) to calculate resin and gel coat emissions.

Potential Styrene (lb/hr) = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb styrene/ton material) * 1 ton material/2000 lbs material

Potential HAPs (ton/year) = Potential Styrene (lb/hr) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)

Potential Cobalt compounds (lb/hr) = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * wt% Cobalt Compounds * (1 - transfer efficiency)

Appendix A: Emissions Calculations

Plasma Cutting Tables

Company Name: Kennedy Tank and Manufacturing Company Incorporated
Address City IN Zip: 833 East Sumner Ave. Indianapolis IN 46227
Permit Number: F097-33787-00554
Reviewer: Tamera Wessel
Date: 1/14/2013

PROCESS	Number of Stations	Maximum material removed per station (cu. in./min)	EMISSION FACTORS**												UNCONTROLLED EMISSIONS (lbs/yr)														
			PM = PM10 = PM2.5 (% of material removed)	Sb wt%	As wt%	Be wt%	Cd wt%	Cr wt%	Co wt%	Pb wt%	Mn wt%	Ni wt%	Se wt%	PM = PM10 = PM2.5	Sb	As	Be	Cd	Cr	Co	Pb	Mn	Ni	Se					
Plasma Cutting	1	7.92	0.7%	0.9%	0.09%	0.09%	0.09%	30%	2.5%	0.05%	15%	76%	0.9%	9,475	85.3	8.5	8.5	8.5	8.5	#####	236.9	4.7	1,421.2	7,200.9	85.3	11,902	lbs/yr		
EMISSION TOTALS																													
Potential Emissions lbs/hr														1.08	0.01	0.00	0.00	0.00	0.32	0.03	0.00	0.16	0.82	0.01	13.57				
Potential Emissions lbs/day														25.96	0.23	0.02	0.02	0.02	7.79	0.65	0.01	3.89	19.73	0.23	325.79				
Potential Emissions tons/year														4.74	0.04	0.004	0.004	0.004	1.42	0.12	0.00	0.71	3.60	0.04	5.95	tons HAPs/yr			

METHODOLOGY

**Emission Factor for plasma cutting from Swedish Institute of Production Engineering Research (found on EPA website). Trials reported for dry cutting of 8 mm thick stainless steel with 3.5 m/min cutting speed, emissions were 7% of the material

density of Inconel 600 used as worst case metal density = 9 (specific gravity of Inconel 600) * 62.43 lb/ft³ (density of water)

Plasma cutting emissions, lb/yr: (# of stations) * (max. material removed^d, in.³/min.) * (emission factor of 7%) * density of SS lb/ft³ * (ft³/1728 in³) * 60 min/hr * 8760 hr/yr

A max. material removed calculated from calculations on 'plasma table rates charts' sheet, which were based on mfg. data for the unit in the facility

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
Welding and Thermal Cutting

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Company Name: Kennedy Tank and Manufacturing Company Incorporated
Address City IN Zip: 833 East Sumner Ave. Indianapolis IN 46227
Permit Number: F097-33787-00554
Reviewer: Tamera Wessel
Date: 1/14/2013

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												
Submerged Arc	4	5		0.036	0.011			0.720	0.220	0.000	0	0.220
Metal Inert Gas (MIG)(carbon steel)	35	3		0.0055	0.0005			0.578	0.053	0.000	0	0.053
Tungsten Inert Gas (TIG)(carbon steel)	6	2		0.0055	0.0005			0.066	0.006	0.000	0	0.006
EMISSION TOTALS												
Potential Emissions lbs/hr								1.36				0.28
Potential Emissions lbs/day								32.72				6.68
Potential Emissions tons/year								5.97				1.22

METHODOLOGY

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

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.

Assume PM=PM10

Appendix A: Emissions Calculations
Insignificant Degreaser

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Company Name: Kennedy Tank and Manufacturing Company Incorporated
Address City IN Zip: 833 East Sumner Ave. Indianapolis IN 46227
FESOP Number: F097-33787-00554

In order for the degreaser to qualify as an insignificant activity under the listing in 326 IAC 2-7-1(21)(J)(vi)(DD), the source shall use solvents "the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months".

Based on a review of the solvents most widely supplied for the industry by Crystal Clean and Safety-Kleen, the following PTE is based on the following conservative estimate:

The solvent has a maximum density of 6.7 lb/gal.

The solvent used in the degreaser contains 100% VOC and up to 0.2% HAP (tetrachloroethylene).

Utilized MSDS for Safety-Kleen 105 Recycled Solvent as worst case HAP content: <http://www.safety-kleen.com/msds/82310rev8-21-09.pdf>

Uncontrolled Potential Emissions

6.7	lb/gal x	100	% VOC x	145	gal/yr ÷	2000	lb/ton =	0.49	tons VOC per year
				0.49	tpy VOC x	0.2	% HAP =	0.001	tons HAP per year

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

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Company Name: Kennedy Tank and Manufacturing Company Incorporated
Address City IN Zip: 833 East Sumner Ave. Indianapolis IN 46227
Permit Number: F097-33787-00554
Pit ID: 097-00554
Reviewer: Tamera Wessel
Date: 1/14/2013

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)
Vehicle (entering plant) (one-way trip)	1.0	2.0	2.0	1.9	3.8	605	0.115	0.2	83.6
Vehicle (leaving plant) (one-way trip)	1.0	2.0	2.0	1.9	3.8	200	0.038	0.1	27.7
Vehicle (entering plant) (one-way trip)	1.0	2.0	2.0	3.2	6.4	605	0.115	0.2	83.6
Vehicle (leaving plant) (one-way trip)	1.0	2.0	2.0	3.2	6.4	200	0.038	0.1	27.7
Vehicle (entering plant) (one-way trip)	1.0	2.0	2.0	32.0	64.0	605	0.115	0.2	83.6
Vehicle (leaving plant) (one-way trip)	1.0	2.0	2.0	32.0	64.0	200	0.038	0.1	27.7
Vehicle (entering plant) (one-way trip)	1.0	2.0	2.0	0.7	1.4	605	0.115	0.2	83.6
Vehicle (leaving plant) (one-way trip)	1.0	2.0	2.0	0.7	1.4	200	0.038	0.1	27.7
Totals			16.0		148.4			0.6	222.6

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

Unmitigated Emission Factor, Ef = $k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (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 =	9.3	9.3	9.3	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, Eext = $E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$
where P = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	4.29	1.09	0.11	lb/mile
Mitigated Emission Factor, Eext =	2.82	0.72	0.07	lb/mile

Type	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)	0.18	0.05	0.00	0.12	0.03	0.00
Vehicle (leaving plant) (one-way trip)	0.06	0.02	0.00	0.04	0.01	0.00
Vehicle (entering plant) (one-way trip)	0.18	0.05	0.00	0.12	0.03	0.00
Vehicle (leaving plant) (one-way trip)	0.06	0.02	0.00	0.04	0.01	0.00
Vehicle (entering plant) (one-way trip)	0.18	0.05	0.00	0.12	0.03	0.00
Vehicle (leaving plant) (one-way trip)	0.06	0.02	0.00	0.04	0.01	0.00
Vehicle (entering plant) (one-way trip)	0.18	0.05	0.00	0.12	0.03	0.00
Vehicle (leaving plant) (one-way trip)	0.06	0.02	0.00	0.04	0.01	0.00
Totals	0.95	0.24	0.02	0.63	0.16	0.02

Methodology

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

Abbreviations

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

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

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Company Name: Kennedy Tank and Manufacturing Company Incorporated
Source Address: 833 East Sumner Ave. Indianapolis IN 46227
Permit Number: F097-33787-00554
Reviewer: Tamera Wessel
Date: 1/14/2013

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)	1.0	2.0	2.0	1.9	3.8	668	0.127	0.3	92.4
Vehicle (leaving plant) (one-way trip)	1.0	2.0	2.0	1.9	3.8	668	0.127	0.3	92.4
Vehicle (entering plant) (one-way trip)	1.0	2.0	2.0	3.2	6.4	668	0.127	0.3	92.4
Vehicle (leaving plant) (one-way trip)	1.0	2.0	2.0	3.2	6.4	668	0.127	0.3	92.4
Vehicle (entering plant) (one-way trip)	1.0	2.0	2.0	32.0	64.0	668	0.127	0.3	92.4
Vehicle (leaving plant) (one-way trip)	1.0	2.0	2.0	32.0	64.0	668	0.127	0.3	92.4
Vehicle (entering plant) (one-way trip)	1.0	2.0	2.0	0.7	1.4	668	0.127	0.3	92.4
Vehicle (leaving plant) (one-way trip)	1.0	2.0	2.0	0.7	1.4	668	0.127	0.3	92.4
Totals			16.0		151.2			2.0	738.8

Average Vehicle Weight Per Trip =

9.5

 tons/trip
Average Miles Per Trip =

0.13

 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 =	9.5	9.5	9.5	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 =

125

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.860	0.172	0.0422	lb/mile
Mitigated Emission Factor, Eext =	0.786	0.157	0.0386	lb/mile

Type	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)	0.04	0.01	0.00	0.04	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
Vehicle (entering plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
Vehicle (entering plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
Vehicle (entering plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.04	0.01	0.00	0.04	0.01	0.00
Totals	0.32	0.06	0.02	0.29	0.06	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)

Abbreviations

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

Appendix A: Emissions Calculations
Summary of Emissions

Page 12 of 12 TSD App A

Company Name: Kennedy Tank and Manufacturing Company Incorporated
Address City IN Zip: 833 East Sumner Ave. Indianapolis IN 46227
Permit Number: F097-33787-00554
Reviewer: Tamera Wessel
Date: 1/14/2013

Uncontrolled PTE (Tons/Yr)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs	Single Haps	Combined Haps
Natural Gas-fired Heaters	0.03	0.12	0.12	0.01	1.53	0.08	1.29	1,851	0.03 Hexane	0.03
Blasting Operations SB3	141.84	121.98	121.98	0	0	0	0	0	1.84 Manganese	1.84
Paint Spray Booth PB1	237.07	237.07	237.07	0	0	221.47	0	0	112.24 Toluene	267.19
Paint Spray Booth PB2	237.07	237.07	237.07	0	0	221.47	0	0	112.24 Toluene	267.19
Fiberglass Application Booth FG6	74.09	74.09	74.09	-	-	93.90	-	-	93.90 Styrene	94.25
Plasma Table PT8	4.74	4.74	4.74	0	0	0.00	0	0	3.60 Nickel	5.95
Welding Activities	5.97	5.97	5.97	0	0	0	0	0	1.22 Mn	1.22
Unpaved Roads	0.63	0.16	0.02	0	0	0	0	0	0 -	0
Paved Roads	0.29	0.06	0.01	0	0	0	0	0	0 -	0
Degreaser DG7	-	-	-	-	-	0.49	-	-	0.001 tetrachloroethylene	0.001
TOTAL (tons/yr)	701.74	681.27	681.08	0.01	1.53	536.92	1.29	1,851	224.48 Toluene	637.67

Controlled / Unlimited PTE (Tons/Yr)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs	Single Haps	Combined Haps
Natural Gas-fired Heaters	0.03	0.12	0.12	0.01	1.53	0.08	1.29	1,851	0.03 Hexane	0.03
Blasting Operations SB3	1.42	1.22	1.22	0	0	0	0	0	0.02 Manganese	0.02
Paint Spray Booth PB1	22.76	22.76	22.76	0	0	221.47	0	0	112.24 Toluene	267.19
Paint Spray Booth PB2	22.76	22.76	22.76	0	0	221.47	0	0	112.24 Toluene	267.19
Fiberglass Application Booth FG6	7.11	7.11	7.11	-	-	93.90	-	-	93.90 Styrene	94.25
Plasma Table PT8	4.74	4.74	4.74	0	0	0	0	0	3.60 Nickel	5.95
Welding Activities	5.97	5.97	5.97	0	0	0	0	0	1.22 Mn	1.22
Unpaved Roads	0.63	0.16	0.02	0	0	0	0	0	0 -	0
Paved Roads	0.29	0.06	0.01	0	0	0	0	0	0 -	0
Degreaser DG7						0.49			0.001	
TOTAL (tons/yr)	65.71	64.89	64.71	0.01	1.53	536.92	1.29	1,851	224.48 Toluene	635.84

Potential to Emit After Issuance (Tons/Yr)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs	Single Haps	Combined Haps
Natural Gas-fired Heaters	0.03	0.12	0.12	0.01	1.53	0.08	1.29	1,851	0.03 Hexane	0.03
Blasting Operations SB3	35.48	30.48	30.48	0	0	0	0	0	0.46 Manganese	0.46
Paint Spray Booth PB1	22.76	22.76	22.76	0	0	98.00	0	0	9.50 -	17.00
Paint Spray Booth PB2	22.76	22.76	22.76	0	0		0	0		
Fiberglass Application Booth FG6	7.11	7.11	7.11	0	0	24.00	0	0	Styrene	
Plasma Table PT8	4.74	4.74	4.74	0	0	0	0	0	3.60 Nickel	5.95
Welding Activities	5.97	5.97	5.97	0	0	0	0	0	1.22 Mn	1.22
Unpaved Roads	0.63	0.16	0.02	0	0	0	0	0	0 -	0
Paved Roads	0.29	0.06	0.01	0	0	0	0	0	0 -	0
Degreaser DG7						0.49				
TOTAL (tons/yr)	99.77	94.16	93.97	0.01	1.53	98.57	1.29	1,851	9.50 -	24.66

Note:

The PM emissions (after control) from the sandblasting operation shall not exceed 8.10 pounds per hour (lbs/hr).

The PM_{2.5} emissions (after control) from the sandblasting operation shall not exceed 6.96 pounds per hour (lbs/hr).

The PM₁₀ emissions (after control) from the sandblasting operation shall not exceed 6.96 pounds per hour (lbs/hr).

The total input of volatile organic compounds (VOCs) delivered to the fiberglass application booth (FG6) shall not exceed twenty-four (24.00) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The total input of volatile organic compounds (VOCs) delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass application booth (FG-6) shall not exceed ninety-eight (98.00) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The total input of any single HAP delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass application booth (FG-6) shall not exceed nine and five tenths (9.50) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The total input of combined HAPs delivered to the two (2) paint spray booth coating applicators (PB1 and PB2) and the fiberglass application booth (FG-6) shall not exceed seventeen (17.00) tons per twelve (12) consecutive month period with compliance determined at the end of each month.



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

July 31, 2014

Mr. Greg Anderson
Kennedy Tank & Manufacturing Co., Inc.
833 E Sumner Ave
Indianapolis, IN 46227

Re: Public Notice
Kennedy Tank & Manufacturing Co., Inc.
Permit Level: New Source FESOP
Permit Number: 097 - 33787 - 00554

Dear Mr. Anderson:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Indianapolis Star in Indianapolis, IN publish the abbreviated version of the public notice no later than August 5, 2014. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Indianapolis Marion Co. Pub. Lib. Garfield Branch, 2502 Shelby St. in Indianapolis IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Tamera Wessel, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-8530 or dial (317) 234-8530.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover letter-2014. dot 4/10/14



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Governor

Thomas W. Easterly
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

July 31, 2014

Indianapolis Star
Attn: Classifieds
307 North Pennsylvania
Indianapolis, Indiana 46204

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Kennedy Tank & Manufacturing Co., Inc., Marion County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 5, 2014.

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

To ensure proper payment, please reference account # 100174737.

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

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: New Source FESOP
Permit Number: 097 - 33787 - 00554

Enclosure
PN Newspaper.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 31, 2014

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

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

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

Applicant Name: Kennedy Tank & Manufacturing Co., Inc.
Permit Number: 097 - 33787 - 00554

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Notice of Public Comment

July 31, 2014

Kennedy Tank & Manufacturing Co., Inc.

097 - 33787 - 00554

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 6/13/13

Mail Code 61-53

IDEM Staff	LPOGOST 7/31/2014 Kennedy Tank And Manufacturing Company Incorporated 097 - 33787 - 00554 draft)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Greg Anderson Kennedy Tank And Manufacturing Company Incorporate 833 E Sumner Ave Indianapolis IN 46227 (Source CAATS)									
2		Patrick W Kennedy President Kennedy Tank And Manufacturing Company Incorporate 833 E Sumner Ave Indianapolis IN 46227 (RO CAATS)									
3		Indianapolis Marion Co. Pub. Lib. Garfield Branch 2502 Shelby St. Indianapolis IN 46203 (Library)									
4		Marion County Health Department 3838 N. Rural St Indianapolis IN 46205-2930 (Health Department)									
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
7		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)									
8		Janette Smith M3V, LLC 11925 East 65th Street, STE 13 Indianapolis IN 46236 (Consultant)									
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