



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: May 28, 2014

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

Source Name: Bulk Transport Corp.

Permit Level: Registration

Permit Number: 091-34071-00148

Source Location: 720 W US Highway 20, Michigan City, Indiana

Type of Action Taken: Initial Permit

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34071.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

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

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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



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

**REGISTRATION
OFFICE OF AIR QUALITY**

**Bulk Transport Corp.
720 W. US Highway 20
Michigan City, Indiana 46360**

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

Registration No. 091-34071-00148	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 28, 2014



SECTION A SOURCE SUMMARY

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

A.1 General Information

The Registrant owns and operates a stationary equipment rental and leasing operation.

Source Address: 720 W. US Highway 20, Michigan City, Indiana 46360
 General Source Phone Number: (219) 898-0108
 SIC Code: 7359 (Equipment Rental and Leasing, Not Elsewhere Classified)
 County Location: LaPorte
 Source Location Status: Attainment for all criteria pollutants
 Source Status: Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) surface coating spray booth, constructed in 2011, utilizing a low pressure air atomization applicator, with a maximum capacity of 0.20 gallons of coating per hour, coating commercial and industrial machinery and equipment, using dry filters to control particulate overspray, and exhausting indoors.

This spray booth is considered a new affected source under 40 CFR 63, Subpart HHHHHH.

- (b) One (1) outdoor abrasive blasting unit, constructed in 2009, with a maximum usage rate of 165 pounds of black beauty slag per hour and 2,250 pounds of metal per hour, for a combined process weight rate of 1.208 tons per hour, no control, and exhausting outdoors.
- (c) One (1) indoor abrasive blasting cabinet, constructed in 2009, with a maximum usage rate of 25 pounds of black beauty slag per hour, using a vacuum collection device as control, and exhausting indoors.
- (d) Five (5) above ground storage tanks, with no control and exhausting outdoors. The emission unit identifiers, year of construction, liquid stored, and capacity are as follows:

Tank ID	Liquid stored	Capacity (gallons)	Year Constructed	Maximum Throughput (gallons/year)
152	Used Oil	6,900	1994	127,750
48	Hydraulic Oil	500	2010	29,200
82	Motor Oil	550	2012	3,650
57	Motor Oil	300	2010	3,650
56	Antifreeze	300	2010	2,190

- (e) Five (5) gas metal arc welding (GMAW) stations, constructed in 1981, with three (3) stations using ER70S, one (1) station using E308, and one (1) station using ER 5154

electrodes, with a maximum consumption rate of 2.5 pounds per station per hour, no control, and exhausting indoors.

- (f) Four (4) oxyacetylene flame cutting stations, constructed in 1981, with a maximum metal cutting thickness of 3 inches and a maximum metal cutting rate of 7 inches per minute, no control, and exhausting indoors.
- (g) Three (3) plasma flame cutting stations, constructed in 1981, with a maximum metal cutting thickness of 3 inches and a maximum metal cutting rate of 7 inches per minute, no control, and exhausting indoors.
- (h) Material handling storage piles, constructed in 2009, with maximum capacity of 61 tons per year.
- (i) Thirty-five (35) natural gas-fired furnaces and heaters, constructed in 2009, no control, and exhausting indoors. The emission unit identifier and maximum input capacity are shown in the following table:

Emission Unit Identifier	Number of Units	Heat Input Capacity (MMBtu/hr), each
Gas Furnace DR85	1	0.085
Gas Furnace Bld A	1	0.657
Gas Furnace Bld 99270	1	2.500
Gas Furnace Bld DR130	1	0.130
Gas Furnace DR100	1	0.100
Gas Furnace RSCA-10	1	0.140
Gas Furnace 4SG400	1	0.400
Comfort Heater	1	0.100
Comfort Heater	13	0.130
Comfort Heater	13	0.140

- (j) Unpaved roadways.

SECTION B GENERAL CONDITIONS

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

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

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

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

- (a) All terms and conditions of permits established prior to Registration No. 091-34071-00148 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

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

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

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

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

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

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

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

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

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

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

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Registrant shall implement the PMPs.

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

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

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

Corrective Actions and Response Steps

C.3 Response to Excursions or Exceedances [326 IAC 2-5.1-3(e)(2)]

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

- (a) The Registrant 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 Registrant 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 registration.
- (e) The Registrant shall record the reasonable response steps taken.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)]

C.4 General Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)]

- (a) Records of all required monitoring data, reports and support information required by this registration shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 Registrant, the Registrant shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this registration, for all record keeping requirements not already legally required, the Registrant shall be allowed up to ninety (90) days from the date of registration issuance or the date of initial start-up, whichever is later, to begin such record keeping.

SECTION D.1

OPERATION CONDITIONS

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

- (a) One (1) surface coating spray booth, constructed in 2011, utilizing a low pressure air atomization applicator, with a maximum capacity of 0.20 gallons of coating per hour, coating commercial and industrial machinery and equipment, using dry filters to control particulate overspray, and exhausting indoors.

This spray booth is considered a new affected source under 40 CFR 63, Subpart HHHHHH.

- (b) One (1) outdoor abrasive blasting unit, constructed in 2009, with a maximum usage rate of 165 pounds of black beauty slag per hour and 2,250 pounds of metal per hour, for a combined process weight rate of 1.208 tons per hour, and exhausting outdoors.

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate from the surface coating spray booth shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:
- (1) The source shall operate the control device in accordance with manufacturer's specifications.
 - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the outdoor abrasive blasting unit shall not exceed 4.65 pound per hour limit when operating at a process weight rate of 1.208 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), when surface coating miscellaneous metal parts or products in the spray booth:

- (a) The Registrant shall not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:
 - (1) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings.
 - (2) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
 - (3) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

If more than one (1) of these emission limitations applies to a specific coating, then the least stringent emission limitation shall apply.

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

Work practices shall include, but not be limited to, the following:

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

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.4 Particulate Control

In order to comply with Condition D.1.1, the outdoor abrasive blasting unit will be suspended when the wind velocity exceeds 10 mph. Wind velocity will be determined before the blasting operations and rechecked hourly during operations. Residue blast material will be wet down with water before removal for disposal.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

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

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

Compliance with the VOC content limits in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis when using non-compliant coatings.

This volume weighted average for each surface coating line 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.

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

D.1.7 Record Keeping Requirements

(a) In order to document the compliance status with Condition D.1.2, the Registrant shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available not later than thirty (30) days after the end of each compliance period.

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

(2) The amount of coating material and solvent used on a daily 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 volume weighted VOC content of the coatings used for each day.

(4) The cleanup solvent usage for each day.

- (5) The total VOC usage for each day.
- (b) Section C - General Record Keeping Requirements contains the Registrant's obligations with regard to the records required by this condition.

SECTION E.1

OPERATION CONDITIONS

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

- (a) One (1) surface coating spray booth, constructed in 2011, utilizing a low pressure air atomization applicator, with a maximum capacity of 0.20 gallons of coating per hour, coating commercial and industrial machinery and equipment, using dry filters to control particulate overspray, and exhausting indoors.

This spray booth is considered a new affected source under 40 CFR 63, Subpart HHHHHH.

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

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

- (a) Pursuant to 40 CFR 63.11174, the Registrant shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR 63, Subpart HHHHHH.
- (b) Pursuant to 40 CFR 63.10, the Registrant shall submit all required notifications and reports 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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

The Registrant shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment A of this registration):

- (a) 40 CFR 63.11170(a)(2) and (b)
(b) 40 CFR 63.11171(a), (b), and (c)(2)
(c) 40 CFR 63.11172(a)(2)
(d) 40 CFR 63.11173(e), (f), and (g)
(e) 40 CFR 63.11174
(f) 40 CFR 63.11175
(g) 40 CFR 63.11176
(h) 40 CFR 63.11177
(i) 40 CFR 63.11178
(j) 40 CFR 63.11180
Table 1 to Subpart HHHHHH of Part 63

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

**REGISTRATION
ANNUAL NOTIFICATION**

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

Company Name:	Bulk Transport Corp.
Address:	720 W. US Highway 20
City:	Michigan City, Indiana 46360
Phone Number:	(219) 898-0108
Registration No.:	091-34071-00148

I hereby certify that Bulk Transport Corp. is:

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. 091-34071-00148.
- not in compliance with the requirements of Registration No. 091-34071-00148.

I hereby certify that Bulk Transport Corp. is:

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

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

Noncompliance:

Attachment A
Registration No: 091-34071-00148

[Downloaded from the eCFR on July 1, 2013]

Electronic Code of Federal Regulations

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

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

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

What This Subpart Covers

§ 63.11169 What is the purpose of this subpart?

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

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

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

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

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

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

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

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

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

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

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

§ 63.11170 Am I subject to this subpart?

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

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

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

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

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

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

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

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

(1) Mixing rooms and equipment;

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

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

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

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

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

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping

equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

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

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

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

General Compliance Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Notifications, Reports, and Records

§ 63.11175 What notifications must I submit?

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

(1) The company name, if applicable.

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

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

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

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

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

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

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

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

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

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

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

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

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

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

§ 63.11176 What reports must I submit?

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

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

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

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

with § 63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in § 63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§ 63.11173(d) and 63.11177(f).

§ 63.11177 What records must I keep?

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

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

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

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

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

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

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

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

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

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

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

Other Requirements and Information

§ 63.11179 Who implements and enforces this subpart?

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

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

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

§ 63.11180 What definitions do I need to know?

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

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

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

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

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

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

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

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

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

- (1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.
- (2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.
- (3) Adhesives, sealants, maskants, or caulking materials.
- (4) Temporary protective coatings, lubricants, or surface preparation materials.
- (5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Painter means any person who spray applies coating.

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

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

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

- (1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.
- (2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.
- (3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§ 63.1(a)(1)-(12)	General Applicability	Yes	
§ 63.1(b)(1)-(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in § 63.11170.
§ 63.1(c)(1)	Applicability After Standard Established	Yes	
§ 63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§ 63.1(c)(5)	Notifications	Yes	
§ 63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§ 63.2	Definitions	Yes	Additional definitions are specified in § 63.11180.
§ 63.3(a)-(c)	Units and Abbreviations	Yes	
§ 63.4(a)(1)-(5)	Prohibited Activities	Yes	
§ 63.4(b)-(c)	Circumvention/Fragmentation	Yes	
§ 63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§ 63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§ 63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	Yes	§ 63.11172 specifies the compliance dates.
§ 63.6(c)(1)-(5)	Compliance Dates for Existing Sources	Yes	§ 63.11172 specifies the compliance dates.
§ 63.6(e)(1)-(2)	Operation and Maintenance	Yes	
§ 63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§ 63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§ 63.6(f)(2)-(3)	Methods for Determining Compliance	Yes	
§ 63.6(g)(1)-(3)	Use of an Alternative Standard	Yes	
§ 63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§ 63.6(i)(1)-(16)	Extension of Compliance	Yes	
§ 63.6(j)	Presidential Compliance Exemption	Yes	
§ 63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§ 63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§ 63.9(a)-(d)	Notification Requirements	Yes	§ 63.11175 specifies notification requirements.
§ 63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§ 63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§ 63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§ 63.9(h)	Notification of Compliance Status	No	§ 63.11175 specifies the dates and required content for submitting the notification of compliance status.
§ 63.9(i)	Adjustment of Submittal Deadlines	Yes	
§ 63.9(j)	Change in Previous Information	Yes	§ 63.11176(a) specifies the dates for submitting the notification of changes report.
§ 63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§ 63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in § 63.11177.
§ 63.10(b)(2)(i)-(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§ 63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§ 63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§ 63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§ 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§ 63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§ 63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in § 63.11176.
§ 63.10(d)(2)-(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§ 63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§ 63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§ 63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§ 63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§ 63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§ 63.12	State Authority and Delegations	Yes	
§ 63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§ 63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in § 63.11173(e)(2) and (3) are incorporated and included in § 63.14.
§ 63.15	Availability of Information/Confidentiality	Yes	
§ 63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§ 63.16(b)-(c)	Performance Track Provisions—reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Description and Location
--

Source Name:	Bulk Transport Corp.
Source Location:	720 W. US Highway 20, Michigan City, Indiana 46360
County:	LaPorte
SIC Code:	7359 (Equipment Rental and Leasing, Not Elsewhere Classified)
Registration No.:	R091-34071-00148
Permit Reviewer:	Brandon Miller

On January 14, 2014, the Office of Air Quality (OAQ) received an application from Bulk Transport Corp. related to the construction and operation of a new equipment rental and leasing operation. The source also performs abrasive blasting, surface coating, and material storage of abrasives.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in LaPorte County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective November 15, 1990, for the 1-hour standard which was revoked effective June 15, 2005.	

- (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. LaPorte 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}**
LaPorte County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant

level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants
LaPorte County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Bulk Transport Corp. on January 14, 2014, relating to the construction and operation of an equipment rental and leasing facility. The facility began operation prior to 1980; however, it wasn't until the addition of the abrasive blasting units in 2009 that the source would have needed a registration. Prior to 2009, the source would have been exempt. Prior to 2009, the source operated one (1) above ground storage tank, welding operations, flame cutting, and the equipment rental and leasing operation. Based on the potential to emit, IDEM, OAQ will issue a registration. The abrasive blasting was added in 2009 which is when the comfort heaters were also added. The paint booth was added in 2011.

The source consists of the following existing emission units:

- (a) One (1) above ground storage tank, identified as #152, constructed in 2004, storing used oil, with a maximum capacity of 6,900 gallons and a maximum throughput of 127,750 gallons per year, no control, and exhausting outdoors.
- (b) Five (5) gas metal arc welding (GMAW) stations, constructed in 1981, with three (3) stations using ER70S, one (1) station using E308, and one (1) station using ER 5154 electrodes, with a maximum consumption rate of 2.5 pounds per station per hour, no control, and exhausting indoors.
- (c) Four (4) oxyacetylene flame cutting stations, constructed in 1981, with a maximum metal cutting thickness of 3 inches and a maximum metal cutting rate of 7 inches per minute, no control, and exhausting indoors.
- (d) Three (3) plasma flame cutting stations, constructed in 1981, with a maximum metal cutting thickness of 3 inches and a maximum metal cutting rate of 7 inches per minute, no control, and exhausting indoors.
- (e) Unpaved roadways.

Unregistered Emission Units and Pollution Control Equipment

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

- (a) One (1) surface coating spray booth, constructed in 2011, utilizing a low pressure air atomization applicator, with a maximum capacity of 0.20 gallons of coating per hour, coating commercial and industrial machinery and equipment, using dry filters to control particulate overspray, and exhausting indoors.

This spray booth is considered a new affected source under 40 CFR 63, Subpart HHHHHH.

- (b) One (1) outdoor abrasive blasting unit, constructed in 2009, with a maximum usage rate of 165 pounds of black beauty slag per hour and 2,250 pounds of metal per hour, for a combined process weight rate of 1.208 tons per hour, and exhausting outdoors.
- (c) One (1) indoor abrasive blasting cabinet, constructed in 2009, with a maximum usage rate of 25 pounds of black beauty slag per hour, using a vacuum collection device as control, and exhausting indoors.
- (d) Four (4) above ground storage tanks, with no control and exhausting outdoors. The emission unit identifiers, year of construction, liquid stored, and capacity are as follows:

Tank ID	Liquid stored	Capacity (gallons)	Year Constructed	Maximum Throughput (gallons/year)
48	Hydraulic Oil	500	2010	29,200
82	Motor Oil	550	2012	3,650
57	Motor Oil	300	2010	3,650
56	Antifreeze	300	2010	2,190

- (e) Material handling storage piles, constructed in 2009, with a maximum capacity of 61 tons per year.
- (f) Thirty-five (35) natural gas-fired furnaces and heaters, constructed in 2009, no control, and exhausting indoors. The emission unit identifier and maximum input capacity are shown in the following table:

Emission Unit Identifier	Number of Units	Heat Input Capacity (MMBtu/hr), each
Gas Furnace DR85	1	0.085
Gas Furnace Bld A	1	0.657
Gas Furnace Bld 99270	1	2.500
Gas Furnace Bld DR130	1	0.130
Gas Furnace DR100	1	0.100
Gas Furnace RSCA-10	1	0.140
Gas Furnace 4SG400	1	0.400
Comfort Heater	1	0.100
Comfort Heater	13	0.130
Comfort Heater	13	0.140

Enforcement Issues

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

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.06	0.25	0.25	0.02	3.27	0.18	2.75	3,951	6.18E-02	5.89E-02 Hexane
Abrasive Blasting	10.63	10.16	1.71	-	-	-	-	-	-	-
Surface Coating	2.41	2.41	2.41	-	-	5.79	-	-	7.45	3.17 Xylene
Tanks	-	-	-	-	-	3.54E-03	-	-	-	-
Welding and Flame Cutting	4.14	4.14	4.14	-	-	-	-	-	0.25	0.16 Manganese
Unpaved Roads	0.62	0.16	0.02	-	-	-	-	-	-	-
Material Handling (Storage Piles)	8.01E-05	3.79E-05	5.74E-06	-	-	-	-	-	-	-
Total PTE of Entire Source	17.86	17.11	8.52	0.02	3.27	5.98	2.75	3,951	7.76	3.17 Xylene
Exemptions Levels**	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 100,000	< 25	< 10
Registration Levels**	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 100,000	< 25	< 10

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".

**The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of particulate matter (PM), particulate matter 10 microns and smaller (PM10), particulate matter 2.5 microns and smaller (PM2.5), and volatile organic compounds (VOC) are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard (NSPS) for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60, Subpart Kb (326 IAC

- 12), are not included in the registration, since the source does not have a storage vessel with a capacity greater than or equal to 19,800 gallons.
- (b) The requirements of the NSPS for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the registration, since the source is not an automobile or light-duty truck assembly plant.
 - (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the registration.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 IAC 20-85), are not included in the registration, since this source is not a major source of HAPs and does not coat vehicles.
- (e) The requirements of the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in the registration, since this source is not a major source of HAPs.
- (f) The requirements of the NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD (326 IAC 20-95), are not included in the registration, since the source is not a major source of HAPs.
- (g) The spray booth is subject to the NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, because the source is an area source and it performs spray application of coatings to motor vehicles or mobile equipment.

The unit subject to this rule includes the following:

One (1) surface coating spray booth, constructed in 2011, utilizing a low pressure air atomization applicator, with a maximum capacity of 0.20 gallons of coating per hour, using dry filters to control particulate overspray, and exhausting indoors.

This spray booth is considered a new affected source under 40 CFR 63, Subpart HHHHHH.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11170(a)(2) and (b)
 - (2) 40 CFR 63.11171(a), (b), and (c)(2)
 - (3) 40 CFR 63.11172(a)(2)
 - (4) 40 CFR 63.11173(e), (f), and (g)
 - (5) 40 CFR 63.11174
 - (6) 40 CFR 63.11175
 - (7) 40 CFR 63.11176
 - (8) 40 CFR 63.11177
 - (9) 40 CFR 63.11178
 - (10) 40 CFR 63.11180
- Table 1 to Subpart HHHHHH of Part 63

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the units except as otherwise specified in 40 CFR 63, Subpart HHHHHH.

- (h) The requirements of the NESHAP for Areas Source Standards for Nine metal Fabrication and Finishing Source Categories, 40 CFR 63.11514, Subpart XXXXXX, are not included in the

registration, since the source is not primarily engaged, as defined in 40 CFR 63.11522, in the operations in one of the nine source categories listed in paragraphs 40 CFR 63.11514(a)(1) through 40 CFR 63.11514(9). The source is primarily engaged in equipment leasing and rentals.

- (i) 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 registration.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is located in LaPorte County, it has actual emissions of NOx and VOC of less than twenty-five (25) tons per year, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- (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.

Surface Coating Spray Booth

- (a) 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate from the surface coating spray booth shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:
 - (1) The source shall operate the control device in accordance with manufacturer's specifications.
 - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
- (b) 326 IAC 8-2-2 (Automobile and Light-Duty Truck Coating Operations)
Pursuant to 326 IAC 8-2-2(b), the surface coating operation is not an automotive assembly plant; therefore, the requirements of 326 IAC 8-2-2 (Automotive and Light-Duty Truck Coating Operations) do not apply.
- (c) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Construction of the spray booth commenced after July 1, 1990, the spray booth has potential emissions greater than 15 pounds per day, and the spray booth coats commercial and industrial machinery and equipment as described in 326 IAC 8-2-9(a)(1), therefore the following requirements apply to this spray booth when surface coating miscellaneous metal parts or products:
 - (1) The Registrant shall not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:
 - (A) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that lacks color or opacity and is transparent and uses the undercoat as a reflectant base or undertone color.

- (B) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
- (C) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

If more than one (1) emission limitation in (A) through (C) above applies to a specific coating, then the least stringent emission limitation shall be applied. Compliance with the VOC content limits established pursuant to 326 IAC 8-2-9 shall be determined by the use of compliant coatings or if a non-compliant coating is used, compliance 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 for each facility:

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

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.

Note: Based on a preliminary evaluation of volume weighted average of coatings, the source may not be able to meet the volume weighted average of coatings for certain small combinations of paint, solvent, and hardener when used in the paint booth.

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

Abrasive Blasting

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the outdoor abrasive blasting operation shall not exceed 4.65 pounds per hour when operating at a process weight rate of 1.208 tons per hour. The pound per hour limitation was calculated with the following equation:
- Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
- $$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$
- $$P = \text{process weight rate in tons per hour}$$
- Based on the calculations, the outdoor abrasive blasting operation does not need a control device to comply with this limit.
- (2) Pursuant to 326 IAC 6-3-1(b)(14), the indoor abrasive blasting cabinet is exempt from the requirements of 326 IAC 6-3-2 because it has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Tanks

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the welding operations are exempt from the requirements of 326 IAC 6-3-2 because they have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour each.

Welding

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the welding operations are exempt from the requirements of 326 IAC 6-3-2 because they have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour each.

Flame Cutting

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the flame cutting operations are exempt from the requirements of 326 IAC 6-3-2 because they have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour each.

Natural Gas Combustion

- (a) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired comfort heaters and furnaces are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.
- (b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired comfort heaters and furnaces 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.
- (c) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas-fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.

Compliance Determination, Monitoring and Testing Requirements

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

Emission Unit/Control	Operating Parameters	Frequency
Spray Booth/Dry Filters ¹	Filter Check	Once per day
	Overspray Observations	Once per week
Outdoor Abrasive Blasting ²	Wind Speed	Before the blasting operation begins and rechecked hourly during blasting operations

- (1) These monitoring conditions are necessary because the dry filters for the spray booth must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).
- (2) These monitoring conditions are necessary to control particulate emissions from the outdoor blasting operation and to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).
- (b) There are no testing requirements applicable to the facilities at this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on January 14, 2014.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. 091-34071-00148. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed registration can be directed to Brandon Miller at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

Appendix A: Emission Calculations

Summary

Company Name: Bulk Transportation Corp.
Address City IN Zip: 720 W. US Hwy 20, Michigan City, Indiana 46360
Permit Number: 091-34071-00148
Reviewer: Brandon Miller
Date: May 5, 2014

Uncontrolled Potential Emissions (ton/year)

Units	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHG as CO ₂ e	Total HAP	Worst-Case Individual HAP
Natural Gas Combustion	0.06	0.25	0.25	0.02	3.27	0.18	2.75	3,951	6.18E-02	5.89E-02 Hexane
Abrasive Blasting	10.63	10.16	1.71	-	-	-	-	-	-	-
Surface Coating	2.41	2.41	2.41	-	-	5.79	-	-	7.45	3.17 Xylene
Tanks	-	-	-	-	-	3.54E-03	-	-	-	-
Welding and Flame Cutting	4.14	4.14	4.14	-	-	-	-	-	0.25	0.16 Manganese
Unpaved Roads	0.62	0.16	0.02	-	-	-	-	-	-	-
Material Handling - Storage Piles	8.01E-05	3.79E-05	5.74E-06	-	-	-	-	-	-	-
Total	17.86	17.11	8.52	0.02	3.27	5.98	2.75	3,951	7.76	3.17 Xylene

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

Company Name: Bulk Transportation Corp.
Address City IN Zip: 720 W. US Hwy 20, Michigan City, Indiana 46360
Permit Number: 091-34071-00148
Reviewer: Brandon Miller
Date: May 5, 2014

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	Emission Unit	Number of Units	Heat Input Capacity (MMBtu/hr) each	Total Heat Input Capacity (MMBtu/hr)
7.6	1020	65.5	Gas Furnace DR85	1	0.085	0.085
			Gas Furnace Bld A	1	0.657	0.657
			Gas Furnace Bld 99270	1	2.500	2.5
			Gas Furnace Bld DR130	1	0.130	0.13
			Gas Furnace DR100	1	0.100	0.1
			Gas Furnace RSCA-10	1	0.140	0.14
			Gas Furnace 4SG400	1	0.400	0.4
			Comfort Heater	1	0.100	0.1
			Comfort Heater	13	0.130	1.69
			Comfort Heater	13	0.140	1.82
			Total			7.622

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.06	0.25	0.25	0.02	3.27	0.18	2.75

*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					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	6.873E-05	3.928E-05	2.455E-03	5.891E-02	1.113E-04	6.159E-02

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.636E-05	3.600E-05	4.582E-05	1.244E-05	6.873E-05	1.794E-04
	Total HAPs					6.177E-02
	Worst HAP					5.891E-02

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	3,928	0.1	0.1
Summed Potential Emissions in tons/yr	3,928		
CO2e Total in tons/yr	3,951		

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

Company Name: Bulk Transportation Corp.
Address City IN Zip: 720 W. US Hwy 20, Michigan City, Indiana 46360
Permit Number: 091-34071-00148
Reviewer: Brandon Miller
Date: May 5, 2014

Outdoor Abrasive Blasting

Maximum Flow Rate of Abrasive (FR) =	165 lb/hr
Fraction of Time Wet Blasting (w) =	0 %
Number of Nozzles (N) =	1

Emission Factors

Pollutant	Sand Blasting of Mild Steel panels	Grit Blasting ¹
PM	0.055	0.0132
PM10	0.013	0.013
PM2.5	0.0013	0.0013

Emissions:

Pollutant	Unlimited Potential to Emit	
	lb/hr	ton/yr
PM	2.178	9.54
PM10	2.145	9.40
PM2.5	0.2145	0.94

Methodology

Emission Factors are from AP-42 table 13.2.6-1, assumed windspeed of 10 mph

Flow rate of actual abrasive (FR) (lb/hr) provided by source

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

¹As stated in AP-42 13.2.6 Abrasive Blasting – 13.2.6.3 Emissions and Controls data gives a comparison of total PM from abrasive blasting using various media.

The study indicated that, on the basis of tons of abrasive used, total PM emissions from abrasive blasting using grit are 24 percent of total PM emissions from abrasive blasting with sand.

Indoor Abrasive Blasting

Maximum Flow Rate of Abrasive (FR) =	25 lb/hr
Fraction of Time Wet Blasting (w) =	0 %
Number of Nozzles (N) =	1

Emission Factors

Pollutant	Grit Blasting
PM	0.01
lb PM10/lb PM	0.7

Emissions:

Pollutant	Unlimited Potential to Emit	
	lb/hr	ton/yr
PM	0.25	1.095
PM10	0.175	0.7665
PM2.5	0.175	0.7665

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

Flow rate of actual abrasive (FR) (lb/hr) provided by source

Appendix A: Emission Calculations

Welding
 Company Name: Bulk Transportation Corp.
 Address City IN Zip: 720 W. US Hwy 20, Michigan City, Indiana 46360
 Permit Number: 091-34071-00148
 Reviewer: Brandon Miller
 Date: May 5, 2014

Material ¹	Density ²	Weight % (H ₂ O & Organics) ²	Weight % H ₂ O ²	Weight % Organics ²	Volume % Water ²	Volume % Non-Volatiles (Solids) ²	Max. Material Usage ¹	Pounds VOC per gallon of coating less water ³	Pounds VOC per gallon of coating ⁴	VOC Emissions ⁵		PM/PM10/PM2.5 ⁶		lb VOC/gal solids ⁷	Transfer Efficiency ⁸
	(lb/gal)	(% w)	(% w)	(% w)	(% v)	(% v)	(gal/hr)	(lb/gal)	(lb/gal)	(lb/hr)	(TPY)	(lb/hr)	(TPY)	(lb/gal)	(%)
Paint															
FP401 paint	10.42	43.90%	0%	44%	0	36.00%	0.110	4.57	4.57	0.50	2.20	0.16	0.70	12.71	75%
AAV0496 paint	8.15	55.00%	0%	55%	0	33.11%	0.200	4.48	4.48	0.90	3.93	0.18	0.80	13.54	75%
TY25623 paint	8.93	46.49%	0%	46%	0	40.77%	0.200	4.15	4.15	0.83	3.64	0.24	1.05	10.18	75%
TY25651 paint	8.83	46.56%	0%	47%	0	40.97%	0.200	4.11	4.11	0.82	3.60	0.24	1.03	10.03	75%
TY25660 paint	8.38	47.12%	0%	47%	0	43.51%	0.200	3.95	3.95	0.79	3.46	0.22	0.97	9.08	75%
11990995 paint	10.01	50.00%	0%	50%	0	4.53%	0.110	5.01	5.01	0.55	2.41	0.14	0.60	110.49	75%
PCC135CV paint	8.71	34.50%	5.3%	29.2%	21.0%	45.00%	0.160	3.22	2.54	0.41	1.78	0.23	1.00	5.65	75%
PCC135B paint	8.02	36.00%	6.6%	29.4%	24.6%	44.00%	0.160	3.13	2.36	0.38	1.65	0.21	0.90	5.36	75%
PCC135IH paint	8.08	37.60%	5.6%	32.0%	22.4%	45.00%	0.160	3.33	2.59	0.41	1.81	0.20	0.88	5.75	75%
PCC135SY paint	8.05	35.90%	7.4%	28.5%	26.4%	42.00%	0.160	3.12	2.29	0.37	1.61	0.21	0.90	5.46	75%
AUE-370 paint	11.42	48.40%	16.5%	31.9%	14.6%	59.93%	0.180	4.27	3.64	0.66	2.87	0.27	1.16	6.08	75%
PIP100 paint	11.89	27.90%	0.0%	27.9%	0.0%	53.00%	0.180	3.32	3.32	0.60	2.62	0.39	1.69	6.26	75%
PIP102 paint	11.76	27.89%	0.0%	27.9%	0.0%	54.00%	0.180	3.28	3.28	0.59	2.59	0.38	1.67	6.07	75%
Thinner															
FT220 thinner	6.93	78.00%	23%	55%	0.2441	0.00%	0.110	5.04	3.81	0.42	1.84	0.04	0.18	0.00	75%
4C4196 thinner	6.89	100.00%	0%	100%	0	0.00%	0.020	6.89	6.89	0.14	0.60	0.00	0.00	0.00	75%
PCR10 thinner	6.59	100.00%	100%	0%	1	0.00%	0.090	0.00	0.00	0.00	0.00	0.00	0.00	0.00	75%
AUE-3501 thinner	12.33	0.00%	0.0%	0.0%	0.0%	100.00%	0.040	0.00	0.00	0.00	0.00	0.12	0.54	0.00	75%
PCR20 thinner	7.50	100.00%	100.0%	0.0%	100.0%	0.00%	0.033	0.00	0.00	0.00	0.00	0.00	0.00	0.00	75%
Hardener															
PIH50 hardener	8.4	3.89%	0%	4%	0	53.00%	0.020	0.33	0.33	0.01	0.03	0.04	0.18	0.62	75%
PIH50 hardener	8.4	3.89%	0.0%	3.9%	0.0%	47.00%	0.003	0.33	0.33	0.00	0.00	0.01	0.03	0.69	75%

Material	PTE (TPY)	
	VOC	PM/PM10/PM2.5
Highest Paint	3.93	1.69
Highest Thinner	1.84	0.54
Highest Hardener	0.03	0.18
Total Emissions ⁹	5.79	2.41

Footnotes:

1. Provided by Bulk Transport.
2. Based on MSDSs.
3. Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
4. Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
5. VOC Emissions (lb/hr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 VOC Emissions (TPY) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
6. PM Emissions (TPY) = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
7. Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
8. Information provided by manufacturers specifications
9. Total VOC/PM Emissions (TPY) = Highest Paint + Highest Thinner + Highest Hardener

Appendix A: Emission Calculations
5 Stage Wash Line WL1

Company Name: Bulk Transportation Corp.
Address City IN Zip: 720 W. US Hwy 20, Michigan City, Indiana 46360
Permit Number: 091-34071-00148
Reviewer: Brandon Miller
Date: May 5, 2014

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Ethylbenzene	Weight % Xylene	Weight % Methanol	Weight % HDI	Weight % 2 Butoxyethyl Acetate	Weight % MIBK	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Methanol Emissions (ton/yr)	HDI Emissions (ton/yr)	2 Butoxyethyl Acetate Emissions (ton/yr)	MIBK Emissions (ton/yr)
Paint																	
FP401 paint	10.42	0.110	1.00	28.00%	0.60%	4.00%	0.00%	0.00%	0.00%	0.00%	1.41	0.03	0.20	0.00	0.00	0.00	0.00
AAY0496 paint	8.15	0.200	1.00	10.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.71	0.07	0.00	0.00	0.00	0.00	0.00
TY25623 paint	8.93	0.200	1.00	0.00%	10.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.78	2.74	0.00	0.00	0.00	0.00
TY25651 paint	8.83	0.200	1.00	5.00%	1.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.39	0.08	0.39	0.00	0.00	0.00	0.00
TY25660 paint	8.38	0.200	1.00	0.00%	5.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.37	0.37	0.00	0.00	0.00	0.00
11990995 paint	10.01	0.110	1.00	0.00%	6.00%	40.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.29	1.93	0.00	0.00	0.00	0.00
PCC135CY paint	8.71	0.160	1.00	2.00%	3.00%	14.00%	0.00%	0.00%	2.00%	0.00%	0.12	0.18	0.85	0.00	0.00	0.12	0.00
PCC135B paint	8.02	0.160	1.00	1.00%	3.00%	16.00%	0.00%	0.00%	1.00%	0.00%	0.06	0.17	0.90	0.00	0.00	0.06	0.00
PCC135IH paint	8.08	0.160	1.00	0.00%	2.00%	13.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.11	0.74	0.00	0.00	0.06	0.00
PCC135SY paint	8.05	0.160	1.00	0.00%	2.00%	9.00%	0.00%	0.00%	2.00%	0.00%	0.00	0.11	0.51	0.00	0.00	0.11	0.00
AUE370 paint	11.42	0.180	1.00	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.09	0.00	0.00	0.00	0.00
PIP100 paint	11.89	0.180	1.00	0.00%	0.10%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00	0.01	0.00	0.00	0.00	0.00	1.03
PIP102 paint	11.76	0.180	1.00	0.00%	0.10%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.93
Thinner																	
FT220 thinner	6.93	0.110	1.00	0.00%	10.00%	45.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.33	1.50	0.00	0.00	0.00	0.00
4C4196 thinner	6.89	0.020	1.00	0.00%	10.00%	45.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.06	0.27	0.00	0.00	0.00	0.00
PCR10 thinner	6.59	0.090	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AUE-3501 thinner	12.33	0.040															
PCR20 thinner	7.5	0.033	1.00	12.00%	2.00%	14.00%	14.00%	0.00%	0.00%	0.00%	0.13	0.02	0.15	0.15	0.00	0.00	0.00
Hardener																	
PIH50 hardener	8.38	0.003	1.00	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AUE3501 hardener	12.3	0.040	1.00	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.02	0.00	0.00
PIH50 hardener	8.38	0.020	1.00	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00

= Paint with Highest HAP Emissions
= Thinner with Highest HAP Emissions
= Hardener with Highest HAP Emissions

Total Highest HAP Paint
Total Highest HAP Thinner
Total Highest HAP Hardener

	Toluene	Ethylbenzene	Xylene	Methanol	HDI	2 Butoxyethyl Acetate	MIBK
	1.4	0.77	2.70	0.00	0.00	0.12	1.03
	0.4	0.07	0.47	0.47	0.00	0.00	0.00
	0.0	0.00	0.00	0.00	0.02	0.00	0.00
Total HAPs	1.80	0.84	3.17	0.47	0.02	0.12	1.03

Footnotes:

1. Provided by Bulk Transport
2. Based on MSDS Sheets
3. HAPS emission rate (tons/yr) = Density (lb./gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
4. Total = Worst Coating + Sum of all solvents used
5. State Potential Emissions (Add worst case coating to all solvents)

**Appendix A: Emission Calculations
Volume Weighted Average**

Company Name: Bulk Transportation Corp.
 Source Address: 720 W. US Hwy 20, Michigan City, Indiana 46360
 Permit Number: 091-34071-00148
 Reviewer: Brandon Miller
 Date: May 5, 2014

Material	Gal of Mat. (gal/hr)	VOC Content of Coating (lbs VOC/gal of coating less water as applied)	$\Sigma(C*U)$	Coating Usage Rate (ΣU)	Volume Weighted Average (A)
Surface Coating					
11990995 paint	0.1	5.0	13.21	2.64	
4C4196 thinner	0.0	3.5	1.68	0.48	
PIH50 hardener	0.0	0.325982	0.16	0.48	
			15.05	3.60	4.18

Methodology

Volume Weighted Average Equation:

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

Where:

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

**Appendix A: Emission Calculations
Above Ground Storage Tanks**

Company Name: Bulk Transportation Corp.
 Source Address: 720 W. US Hwy 20, Michigan City, Indiana 46360
 Permit Number: 091-34071-00148
 Reviewer: Brandon Miller
 Date: May 5, 2014

Tank ID	Liquid Stored	Capacity (gallons)	Tank Diameter (ft)	Tank Length (ft)	Maximum Throughput (gal/year)	VOC Emissions (lbs/year) ¹	VOC Emissions (tons/year)
152	Used Oil	6,900	9	22	127,750	5.93	2.97E-03
48	Hydraulic Oil	500	5	7	29,200	0.67	3.35E-04
82	Motor Oil	550	6	8	3,650	0.27	1.35E-04
57	Motor Oil	300	3.5	6	3,650	0.11	5.50E-05
56	Antifreeze	300	3.5	6	2,190	0.09	4.50E-05
Total						7.07	3.54E-03

Methodology

VOC emissions (lbs/year) were estimated using TANKS version 4.09d

VOC Emissions (tons/year) = VOC emissions (lbs/year) * 1 ton/2,000 lbs

**Appendix A: Emission Calculations
Above Ground Storage Tanks**

Company Name: Bulk Transportation Corp.
 Source Address: 720 W. US Hwy 20, Michigan City, Indiana 46360
 Permit Number: 091-34071-00148
 Reviewer: Brandon Miller
 Date: May 5, 2014

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr) ¹	EMISSION FACTORS ² (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
GMAW- Electrode ER70S	3	2.5		0.0052	0.00318	0.00001	0.00001	0.039	0.024	0.000	0.000075	0.024
GMAW- Electrode E308	1	2.5		0.0054	0.00346	0.00184	0.00524	0.014	0.009	0.005	0.0131	0.026
GMAW- Electrode ER5154	1	2.5		0.0241	0.00034		0.0001	0.060	0.001	0.000	0.00025	0.001
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.) ²	Max. Metal Cutting Rate (in./minute) ²	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick) ³				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	4	3	7	0.1622	0.0005	0.0001	0.0003	0.817	0.003	0.001	0.002	0.005
Plasma**	3	3	7	0.0039				0.015	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr							Totals:	0.94	0.04	0.01	0.01	0.06
Potential Emissions lbs/day								22.68	0.86	0.12	0.36	1.34
Potential Emissions tons/year								4.14	0.16	0.02	0.07	0.25

Methodology

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor)
 Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor)
 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
 PM = PM10 = PM2.5

Footnotes:

1. Per manufacturers specifications
2. Emission Factors obtained from AP-42 Chapter 12 Section 12.19 and from the American Welding Society (AWS).
3. Emission Factor for plasma cutting from American Welding Society (AWS).

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

Company Name: Bulk Transportation Corp.
 Source Address: 720 W. US Hwy 20, Michigan City, Indiana 46360
 Permit Number: 091-34071-00148
 Reviewer: Brandon Miller
 Date: May 5, 2014

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)	4.0	1.0	4.0	8.5	34.0	685	0.130	0.5	189.4
Vehicle (leaving plant) (one-way trip)	4.0	1.0	4.0	8.5	34.0	964	0.183	0.7	266.6
Totals			8.0		68.0			1.2	456.0

Average Vehicle Weight Per Trip = $\frac{8.5}{4.0}$ tons/trip
 Average Miles Per Trip = $\frac{0.16}{4.0}$ miles/trip

Unmitigated Emission Factor, Ef = $k \cdot \left(\frac{s}{12}\right)^a \cdot \left(\frac{W}{3}\right)^b$ (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 =	8.5	8.5	8.5	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 = $E \cdot \left[\frac{365 - P}{365}\right]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E \cdot \left[\frac{365 - P}{365}\right]$
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	4.12	1.05	0.11	lb/mile
Mitigated Emission Factor, Eext =	2.71	0.69	0.07	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.39	0.10	0.01	0.26	0.07	0.01
Vehicle (leaving plant) (one-way trip)	0.55	0.14	0.01	0.36	0.09	0.01
Totals	0.94	0.24	0.02	0.62	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)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

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

**Appendix A: Emission Calculations
Material Handling - Storage Piles**

Company Name: Bulk Transportation Corp.
 Source Address: 720 W. US Hwy 20, Michigan City, Indiana 46360
 Permit Number: 091-34071-00148
 Reviewer: Brandon Miller
 Date: May 5, 2014

Maximum Throughput Rate 61 tons/year

k¹ = 0.74 PM particle size multiplier
 0.35 PM10 particle size multiplier
 0.053 PM2.5 particle size multiplier

U² = 10.2 mean wind speed (mph)
 M³ = 3.6 material moisture content (%)

Emission Unit	Emission Factors			Uncontrolled Emissions					
	PM (lb/ton)	PM10 (lb/ton)	PM2.5 (lb/ton)	PM (lb/hr)	PM (ton/yr)	PM10 (lb/hr)	PM10 (ton/yr)	PM2.5 (lb/hr)	PM2.5 (ton/yr)
Material Handling	0.00263	0.00124	0.00019	1.83E-05	8.01E-05	8.65E-06	3.79E-05	1.31E-06	5.74E-06

Methodology:

Emission Factor (lb/ton) = $k * 0.0032 * [(U/5)^{1.3} / (M/2)^{1.4}]$

Emission Factor equation is from EPA's AP-42 Section 13.2.4

¹k values were provided in EPA's AP-42 Section 13.2.4

²Mean wind speed at the South Bend Indiana station from EPA's TANKS v4.09d

³Moisture content is from EPA's AP-42 Table 13.2.4-1.

Uncontrolled Emissions (lb/hr) = Maximum Throughput Rate (tons/yr) * Emission Factor (lb/ton) * 1yr/8,760hr

Uncontrolled Emissions (ton/yr) = Maximum Throughput Rate (tons/yr) * Emission Factor (lb/ton) * 1 ton particulate/2,000 lbs particulate



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Lucas Blumenfeld
Bulk Transport Corporation
720 W US Highway 20
Michigan City, IN 46360

DATE: May 28, 2014

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

SUBJECT: Final Decision
Registration
091-34071-00148

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Valarie Blumenfeld - President
Andy Perdue – Weaver Boos Consultants
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 5/28/2014 Bulk Transport Corporation 091-34071-00148 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Lucas Blumenfeld Bulk Transport Corporation 720 W US HWY 20 Michigan City IN 46360 (Source CAATS) via confirmed delivery										
2		Valarie Blumenfeld President Bulk Transport Corporation 720 W US HWY 20 Michigan City IN 46360 (RO CAATS)										
3		LaPorte County Commissioners 555 Michigan Avenue # 202 LaPorte IN 46350 (Local Official)										
4		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
5		LaPorte County Health Department County Complex, 4th Floor, 809 State St. LaPorte IN 46350-3329 (Health Department)										
6		Mr. Dick Paulen Barnes & Thornburg 121 W Franklin Street Elkhart IN 46216 (Affected Party)										
7		Andy Perdue Weaver Boos Consultants 35 E Wacker Drive Suite 1250 Chicago IL 60601 (Consultant)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
6			