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:	September 30, 2014
From:	Matthew Stuckey, Chief Permits Branch Office of Air Quality
Source Name:	Superior Metal Technologies
Permit Level:	FESOP - Significant Permit Revision
Permit Number:	097 - 34743 - 00127
Source Location:	9850 East 30th Street, Indianapolis, Indiana
Type of Action Taken:	Modification at an existing source Revisions to permit requirements

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the 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 34743.

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

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

September 30, 2014

Curt Lamb
Superior Metal Technologies
9850 East 30th Street
Indianapolis, IN 46229

Re: 097-34743-00127
Significant Revision to
F097-32751-00127

Dear Mr. Lamb:

Superior Metal Technologies was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F097-32751-00127 on for a stationary fabrication, anodizing, and surface coating of architectural metal products plant located at 9850 East 30th Street, Indianapolis, Indiana 46229. On , the Office of Air Quality (OAQ) received an application from the source requesting to construct a regenerative thermal oxidizer (RTO#1) as an additional VOC control device for its coating line. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this revision:

Attachment A: 40 CFR 63, Supart HHHHHH (6H) National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Ryan Graunke of my staff at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/REG

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Superior Metal Technologies
9850 East 30th Street
Indianapolis, Indiana 46229

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

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

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

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

Operation Permit No.: F097-32751-00127	
Issued by: Original Signed Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 25, 2013 Expiration Date: July 25, 2023

Significant Permit Revision No.: 097-34743-00127	
Issued by: Iryn Calilung, Section Chief, Permits Branch Office of Air Quality	Issuance Date: September 30, 2014 Expiration Date: July 25, 2023

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary fabrication, anodizing, and surface coating of architectural metal products plant.

Source Address:	9850 East 30th Street, Indianapolis, Indiana 46229
General Source Phone Number:	(317) 538-1685
SIC Code:	3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)
County Location:	Marion (Warren Township)
Source Location Status:	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

One (1) Coating Line, installed in 1989, modified in 2013 to add a secondary control device, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

(c) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

These four (4) booths use dry filters for particulate matter overspray control,

These four (4) booths are contained within a total enclosure paint tunnel maintained under negative pressure, and use the following control devices operating in series for VOC control:

(1) One (1) natural gas fired catalytic thermal oxidizer, identified as Cat-Ox #1, with a maximum heat input of 0.4 million Btu per hour, and exhausting to RTO#1.

Note: Cat-Ox #1 is used only for concentrating VOC and HAPs from the paint spray booths. Oxidization does not occur in Cat-Ox#1.

(2) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO #1, constructed in 2013, with a maximum heat input of 3.24 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Note: Drying Oven (OV-1) is not controlled by Cat-Ox#1, and exhausts directly to RTO #1.

Under 40 CFR 63, Subpart HHHHHH (6H), the coating line is considered part of an affected source.

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

This stationary source also includes the following insignificant activities:

(a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input capacity of 6.3 million Btu per hour;

(2) Three (3) natural gas fired space heaters, identified as H1 through H3, each with a maximum heat input capacity of 0.1 million Btu per hour;

(3) Four (4) natural gas fired HVAC units, identified as HVAC-1 through HVAC-4, each with a maximum heat input capacity of 0.048 million Btu per hour;

(4) One (1) natural gas fired air make up unit, identified as AM-1, with a maximum heat input capacity of 5.0 million Btu per hour;

(5) One (1) natural gas fired air make up unit, identified as AM-2, with a maximum heat input capacity of 3.0 million Btu per hour;

(6) One (1) natural gas fired process tank heater, identified as S-10, with a maximum heat input capacity of 1.0 million Btu per hour;

(7) One (1) natural gas fired dry off oven, identified as OV-2, with a maximum heat input capacity of 1.0 million Btu per hour; and

(8) One (1) natural gas fired steam boiler with a maximum heat input capacity of 0.382 million Btu per hour.

(b) One (1) powder coating booth with a maximum throughput of 35.6 pounds of powder coating per hour, using dry filters and a dust collector for particulate control, and exhausting indoors;

(c) Three (3) metal inert gas (MIG) welding stations with two (2) stations each with a maximum usage rate of one (1) pound of carbon steel electrode per hour and one (1) station with a maximum usage rate of three (3) pound of carbon steel electrode per hour, using no control, and exhausting indoors;

(d) Aluminum sawing operation cutting aluminum with a maximum size of 96 cubic inches per linear feet, using no control, exhausting indoors, and consisting of the following:

(1) Vertical band saw with a maximum line speed of 61.5 linear feet per second.

(2) Horizontal band saw with a maximum line speed of 24.0 linear feet per second

(e) One (1) anodizing operation, using no control, exhausting indoors, and consisting of the following consisting of the following:

(1) One (1) etch tank with a surface area of 144 square feet and a maximum throughput of 4.86 pounds of etch powder per hour, containing no VOC or HAPs;

(2) One (1) color tank with a surface area of 144 square feet and a maximum throughput of 1.08 gallons of color solution per hour, containing no VOC or HAPs;

(3) One (1) sealant tank with a surface area of 144 square feet and a maximum throughput of 0.8 gallons of sealant per hour, containing no VOC or HAPs;

(4) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 4.41 pounds of cleaner powder per hour, containing VOC but no HAPs;

(5) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 3.41 pounds of cleaner powder per hour, containing no VOC or HAPs;

(6) One (1) deoxidizing tank with a surface area of 144 square feet and a maximum throughput of 3.41 gallons of deoxidizing solution per hour, containing no VOC or HAPs; and

(7) Six (6) to twelve (12) water rinsing tanks.

(f) One (1) paint pre-treat cleaning operation consisting of alkaline cleaner, chrome phosphate cleaner, hydrofluoric acid cleaner, and water rinse tanks and an associated dry off oven for cleaning miscellaneous metal parts in preparation for surface coating application(s), with a maximum usage of 0.14 pounds of cleaner per hour, using no control, and exhausting indoors;

(g) One (1) polyurethane thermal fill operation with a maximum usage of 440.0 gallons of each component per year, using no control, and exhausting indoors;

(h) Paved roads and parking lots with public access;

(i) Storage tanks with capacity less than or equal to 1000 gallons and annual throughputs less than 12,000 gallons. Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;

(j) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(k) Closed loop heating and cooling systems;

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%;

(m) Heat exchanger cleaning and repair;

(n) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process; and

(o) Blowdown for any of the following: sight glass, boiler, compressor, pump or cooling tower.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, F097-32751-00127, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(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.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F097-32751-00127 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

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

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

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

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

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

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

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

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

Indianapolis, Indiana 46204-2251

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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

(AA) All calibration and maintenance records.

(BB) All original strip chart recordings for continuous monitoring instrumentation.

(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.

(BB) The dates analyses were performed.

(CC) The company or entity that performed the analyses.

(DD) The analytical techniques or methods used.

(EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

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

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

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

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

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

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

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) Coating Line, installed in 1989, modified in 2013 to add a secondary control device, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

(c) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

These four (4) booths use dry filters for particulate matter overspray control,

These four (4) booths are contained within a total enclosure paint tunnel maintained under negative pressure, and use the following control devices operating in series for VOC control:

(1) One (1) natural gas fired catalytic thermal oxidizer, identified as Cat-Ox #1, with a maximum heat input of 0.4 million Btu per hour, and exhausting to RTO#1.

Note: Cat-Ox #1 is used only for concentrating VOC and HAPs from the paint spray booths. Oxidization does not occur in Cat-Ox#1.

(2) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO #1, constructed in 2013, with a maximum heat input of 3.24 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Note: Drying Oven (OV-1) is not controlled by Cat-Ox#1, and exhausts directly to RTO #1.

Under 40 CFR 63, Subpart HHHHHH (6H), the coating line is considered part of an affected source.

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

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

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

Pursuant to 326 IAC 2-8-4 and to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(a) The total input of VOC at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), including VOC cleaners and solvents, shall not exceed 354.20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The total input of any single HAP at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), shall not exceed 35.03 tons per twelve (12) consecutive month period with

compliance determined at the end of each month.

(c) The total input of the combined HAPs at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), shall not exceed 86.58 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(d) The catalytic thermal oxidizer (Cat-Ox #1) and regenerative thermal oxidizer (RTO #1) in series shall control the VOC and HAPs emissions from the Coating Line and the overall combined control efficiency of the catalytic thermal oxidizer (Cat-Ox #1) and regenerative thermal oxidizer (RTO #1) shall be greater than or equal to 74.6%.

(e) The paint tunnel as a total enclosure with negative pressure shall be in operation at all times when the Coating Line is in operation.

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

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

(a) Pursuant to 326 IAC 8-2-9(c)(2), the Permittee shall not discharge into the atmosphere VOC from the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator

(b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions from the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$E = L / (1 - (L/D)$

Where:

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating
D = Density of VOC in coating in pounds per gallon of VOC;

A solvent density of 7.36 pounds of VOC per gallon of solvent in the coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2(a).

The pounds of VOC per gallon of coating solids shall be limited to less than or equal to 6.67 pounds of VOC per gallon coating solids as applied.

(c) Pursuant to 326 IAC 8-1-2(c), the overall combined control efficiency of the in-series combination of the catalytic thermal oxidizer (Cat-Ox #1) and regenerative thermal oxidizer (RTO #1) shall be no less than the equivalent overall efficiency calculated by the following equation:

$O = \underline{V - E} \times 100$

V

Where:

V = The actual VOC content of the coatings as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control devices as a percentage.

The overall combined control efficiency of the in-series combination of catalytic thermal oxidizer (Cat-Ox #1) regenerative thermal oxidizer (RTO #1) shall be greater than or equal to 74.6%.

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

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

(a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(e) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.4 Particulate [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

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

Pursuant to 326 IAC 8-1-2(a) and to comply with Conditions D.1.1 and D.1.2, the Permittee shall operate the paint tunnel total enclosure and the in-series combination of the catalytic thermal oxidizer (Cat-Ox #1), and regenerative thermal oxidizer (RTO #1) at all times the coating line is in operation.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC input usage and content contained in Conditions D.1.1 and 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.1.8 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform inlet and outlet VOC and HAPs testing of the in-series combination of the catalytic thermal oxidizer (Cat-Ox #1) and regenerative thermal oxidizer (RTO #1), utilizing methods approved by the Commissioner not later than one hundred and eighty (180) days after the issuance of Significant Permit Revision, 097-34743-00127. Testing for HAPs shall be for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.9 Paint Tunnel Total Enclosure

Pursuant to FESOP No. F097-7881-00127, issued on January 22, 1998, determination of a total enclosure, as defined by 40 CFR Part 51 Method 204, shall be made by each of the following methods:

(a) Any natural draft opening must be at least four (4) equivalent diameters from spray booths B-1, B-2, B-5, and B-6;

(b) The total area of all natural draft openings shall not exceed five (5) percent of the surface area of the enclosures four walls, floor and ceiling;

(c) The direction of flow through all natural draft openings shall be into the paint tunnel. The average facial velocity of air through all natural draft openings shall be at least two hundred (200) feet per minute;

(d) All paint tunnel access doors and windows shall be closed during operation.

D.1.10 Particulate Control

In order to comply with Condition D.1.4, the dry filters for particulate control shall be in operation at all times when the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6) is in operation.

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

D.1.11 Catalytic Thermal Oxidizer (Cat-Ox #1) Induced Fan Amperage

(a) The fan amperage on the concentrator fan at the catalytic thermal oxidizer (Cat-Ox #1) shall be observed at least once per day when the Paint Tunnel surface coating is in operation. When for any one reading, the fan amperage is outside the normal range of 37 to 54 amps, or the range established in most recent compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside this range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) The fan amperage on the catalytic thermal oxidizer (Cat-Ox #1) fan shall be observed at least once per day when the Paint Tunnel surface coating is in operation. When for any one reading, the fan amperage is outside the normal range of 14 to 20 amps, or the range established in most recent compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside this range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.12 Regenerative Thermal Oxidizer (RTO #1) Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour rolling average. From the date of startup until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour rolling average temperature of 1,400°F.

(b) The Permittee shall determine the 3-hour rolling average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2.

(c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour rolling average temperature as observed during the compliant stack test.

D.1.13 Regenerative Thermal Oxidizer (RTO #1) Fan Amperage

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.1.14 Dry Filter Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S-OX while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.15 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain the 'Paint Department Operation Log', 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 and HAP usage limits established in Condition D.1.1, and the VOC emission limit established in Condition D.1.2. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.

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

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The monthly cleanup solvent usage.

(4) The total VOC and HAP (single and combined) usage for each month.

(5) The weight of VOC and HAP (single and combined) emitted for each compliance period.

(b) To document the compliance status with Condition D.1.11, the Permittee shall maintain the following:

(1) Records of the fan amperage for the concentrator fan taken once per day. The Permittee shall include in its daily record when a fan amperage reading is not taken and the reason for the lack of fan amperage reading (e.g., the process did not operate that day).

(2) Records of the fan amperage for the catalytic thermal oxidizer (Cat-Ox #1) fan taken once per day. The Permittee shall include in its daily record when a fan amperage reading is not taken and the reason for the lack of fan amperage reading (e.g., the process did not operate that day).

(c) To document the compliance status with Conditions D.1.12 and D.1.13, the Permittee shall maintain the following:

(1) Continuous temperature records (on a 3-hour rolling average basis) for the regenerative thermal oxidizer (RTO #1) and the 3-hour rolling average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) Records of the fan amperage for the regenerative thermal oxidizer (RTO #1) fan taken once per day. The Permittee shall include in its daily record when a fan amperage reading is not taken and the reason for the lack of fan amperage reading (e.g., the process did not operate that day).

(d) To document compliance with Condition D.1.14, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.

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

D.1.16 Reporting Requirements

The 'Paint Department Operation Log' and a quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The following insignificant activities as defined in 326 IAC 2-7-1(21):

(a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input capacity of 6.3 million Btu per hour;

(2) Three (3) natural gas fired space heaters, identified as H1 through H3, each with a maximum heat input capacity of 0.1 million Btu per hour;

(3) Four (4) natural gas fired HVAC units, identified as HVAC-1 through HVAC-4, each with a maximum heat input capacity of 0.048 million Btu per hour;

(4) One (1) natural gas fired air make up unit, identified as AM-1, with a maximum heat input capacity of 5.0 million Btu per hour;

(5) One (1) natural gas fired air make up unit, identified as AM-2, with a maximum heat input capacity of 3.0 million Btu per hour;

(6) One (1) natural gas fired process tank heater, identified as S-10, with a maximum heat input capacity of 1.0 million Btu per hour;

(7) One (1) natural gas fired dry off oven, identified as OV-2, with a maximum heat input capacity of 1.0 million Btu per hour; and

(8) One (1) natural gas fired steam boiler with a maximum heat input capacity of 0.382 million Btu per hour.

(b) One (1) powder coating booth with a maximum throughput of 35.6 pounds of powder coating per hour, using dry filters and a dust collector for particulate control, and exhausting indoors;

(c) Three (3) metal inert gas (MIG) welding stations with two (2) stations each with a maximum usage rate of one (1) pound of carbon steel electrode per hour and one (1) station with a maximum usage rate of three (3) pound of carbon steel electrode per hour, using no control, and exhausting indoors;

(d) Aluminum sawing operation cutting aluminum with a maximum size of 96 cubic inches per linear feet, using no control, exhausting indoors, and consisting of the following:

(1) Vertical band saw with a maximum line speed of 61.5 linear feet per second.

(2) Horizontal band saw with a maximum line speed of 24.0 linear feet per second

(e) One (1) anodizing operation, using no control, exhausting indoors, and consisting of the following consisting of the following:

(1) One (1) etch tank with a surface area of 144 square feet and a maximum throughput of 4.86 pounds of etch powder per hour, containing no VOC or HAPs;

(2) One (1) color tank with a surface area of 144 square feet and a maximum throughput

of 1.08 gallons of color solution per hour, containing no VOC or HAPs;

(3) One (1) sealant tank with a surface area of 144 square feet and a maximum throughput of 0.8 gallons of sealant per hour, containing no VOC or HAPs;

(4) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 4.41 pounds of cleaner powder per hour, containing VOC but no HAPs;

(5) One (1) cleaner tank with a surface area of 144 square feet and a maximum throughput of 3.41 pounds of cleaner powder per hour, containing no VOC or HAPs;

(6) One (1) deoxidizing tank with a surface area of 144 square feet and a maximum throughput of 3.41 gallons of deoxidizing solution per hour, containing no VOC or HAPs; and

(7) Six (6) to twelve (12) water rinsing tanks.

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

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

D.2.1 Particulate [326 IAC 6.5-1-2]

(1) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from the two (2) natural gas fired boilers shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

(2) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from all other natural gas combustion units (including Cat-OX#1, RTO#1, and OV-1 listed in Section D.1) shall not exceed three-hundredth (0.03) grain per dry standard cubic foot (dscf).

(3) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant powder coating booth shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(4) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the three (3) insignificant welding stations shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(5) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant aluminum sawing operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(6) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the insignificant anodizing operation shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) Coating Line, installed in 1989, modified in 2013 to add a secondary control device, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

(c) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

These four (4) booths use dry filters for particulate matter overspray control,

These four (4) booths are contained within a total enclosure paint tunnel maintained under negative pressure, and use the following control devices operating in series for VOC control:

(1) One (1) natural gas fired catalytic thermal oxidizer, identified as Cat-Ox #1, with a maximum heat input of 0.4 million Btu per hour, and exhausting to RTO#1.

Note: Cat-Ox #1 is used only for concentrating VOC and HAPs from the paint spray booths. Oxidization does not occur in Cat-Ox#1.

(2) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO #1, constructed in 2013, with a maximum heat input of 3.24 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Note: Drying Oven (OV-1) is not controlled by Cat-Ox#1, and exhausts directly to RTO #1.

Under 40 CFR 63, Subpart HHHHHH (6H), the coating line is considered part of an affected source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

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

Pursuant to 40 CFR 63, the Permittee 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 (6H).

E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH (6H)]

The Permittee, which engages in miscellaneous surface coating, shall comply with the following provisions of 40 CFR 63, Subpart HHHHHH (6H) (included as Attachment A of this permit):

(a) 40 CFR 63.11169(c)
(b) 40 CFR 63.11170(a)(3) and (b)
(c) 40 CFR 63.11171(a), (b), and (e)
(d) 40 CFR 63.11172(b)
(e) 40 CFR 63.11173(e), (f), (g)(2), and (g)(3)
(f) 40 CFR 63.11174
(g) 40 CFR 63.11175(a),(b)
(h) 40 CFR 63.11176(a)
(i) 40 CFR 63.11177(a), (b), (c), (d), (g), and (h)
(j) 40 CFR 63.11178
(k) 40 CFR 63.11179
(l) 40 CFR 63.11180
(m) Table 1 to Subpart HHHHHH (6H) of Part 63

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP Permit No.: F097-32751-00127

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP Permit No.: F097-32751-00127

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP Permit No.: F097-32751-00127
Facility: Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)
Parameter: VOC, single and combined HAPs usages
Limit:
(a) The total input VOC usage at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), including VOC cleaners and solvents, shall not exceed 354.20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
(b) The total input of any single HAP at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), shall not exceed 35.03 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
(c) The total input of the combined HAPs at the Coating Line (Spray Booths: B-1, B-2, B-5, and B-6), shall not exceed 86.58 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

Month	Total Usage This Month (tons)			Total Usage Previous 11 Months (tons)			Total 12-Month Usage (tons)		
	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

*List the single HAP with the greatest emission rate

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP Permit No.: F097-32751-00127

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

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

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Page 2 of 2

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

Form Completed by:________________________________

Title / Position:____________________________________

Date:____

Phone: ____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Superior Metal Technologies**
Source Location:	**9850 East 30th Street, Indianapolis, Indiana 46229**
County:	**Marion**
SIC Code:	**3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)**
Operation Permit No.:	**F097-32751-00127**
Operation Permit Issuance Date:	**July 25 ,2013**
Significant Permit Revision No.:	**097-34743-00127**
Permit Reviewer:	**Ryan Graunke**

On July 18, 2014, the Office of Air Quality (OAQ) received an application from Superior Metal Technologies related to a modification to an existing stationary fabrication, anodizing, and surface coating of architectural metal products plant.

Existing Approvals

The source was issued FESOP Renewal No. F097-32751-00127 on July 25, 2013. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Marion County (Warren Township):

Pollutant	Designation
SO_2	Non-attainment effective October 4, 2013, for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the county.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Attainment effective July 11, 2013, 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]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as

attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Marion County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the ATSD of F097-32751-00127, issued on July 25, 2013.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Coating Line (B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	90.00	-	-	22.00	8.90 (Glycol ethers)
Natural Gas Combustion	0.17	0.68	0.68	0.05	8.92	0.49	7.49	10,770	0.17	0.16 (Hexane)
Powder Coating	1.48	1.48	1.48	-	-	-	-	-	-	-
Welding stations	0.12	0.12	0.12	-	-	-	-	-	0.01	0.01 (Mn)
Aluminum Sawing	0.01	0.01	0.01	-	-	-	-	-	-	-
Anodizing Tanks	2.27	2.27	2.27	-	-	1.93	-	-	-	-
Paint Pre-treat Cleaners	-	-	-	-	-	-	-	-	0.18	0.18 (HF)
Thermal Fill	-	-	-	-	-	2.77	-	-	1.02	1.02 (MDI)
Paved Roads	0.30	0.06	0.01	-	-	-	-	-	-	-
Total PTE of Entire Source	**83.03**	**83.30**	**83.26**	**0.05**	**8.92**	**95.19**	**7.49**	**10,770**	**23.38**	**8.90 (Glycol Ethers)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	100,000 CO_2e	NA	NA
Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA

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

(a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO_2 equivalent (CO_2e) emissions per year.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Superior Metal Technologies on July 18, 2014, relating to the addition of a regenerative thermal oxidizer (RTO#1) to be used in conjunction with the existing catalytic thermal oxidizer (Cat-Ox #1) to comply with FESOP limits, 326 IAC 8-2-9 and 40 CFR 63, Subpart HHHHHH (6H). Prior to the modification, Cat-Ox #1 was controlling VOC and HAPs emissions from both the spray booths and drying oven. After this modification, only the spray booths are controlled by Cat-Ox #1, in which the VOC and HAPs are concentrated, the concentrated VOC and HAPs from Cat-Ox #1 will then be oxidized in the RTO #1. Oxidization no longer occurs in Cat-Ox#1. The drying oven vents directly to RTO#1.

RTO#1 was constructed in 2013 and is being included in the permit in this proposed revision.

There are no proposed changes to existing limits even though there is an additional add-on control.

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

One (1) Coating Line, installed in 1989, modified in 2013 to add a secondary control device, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

(c) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

These four (4) booths use dry filters for particulate matter overspray control.

These four (4) booths are contained within a total enclosure paint tunnel maintained under negative pressure, and use the following control devices operating in series for VOC control:

(1) One (1) natural gas-fired catalytic thermal oxidizer, identified as Cat-Ox #1, constructed in 1989, with a maximum heat input of 0.4 million Btu per hour, and exhausting to RTO #1;

Note: Cat-Ox #1 is used only for concentrating VOC and HAPs from the paint spray booths. Oxidization does not occur in Cat-Ox#1.

(2) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO #1, constructed

in 2013, with a maximum heat input of 3.24 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Note: Drying Oven (OV-1) is not controlled by Cat-Ox#1, and exhausts directly to RTO #1.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
RTO #1	0.03	0.11	0.11	0.01	1.4	0.08	1.17	1,680	0.026	0.025 - Hexane
Total PTE of Proposed Revision	**0.03**	**0.11**	**0.11**	**0.01**	**1.4**	**0.08**	**1.17**	**1,680**	**0.026**	**0.025 - Hexane**

Even though the PTE of the RTO #1 is at exempt levels, pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision. The proposed revision is not an Administrative Amendment or Minor Permit revision because the proposed revision involves testing, monitoring, maintenance, or record keeping requirement that is environmentally significant and is required by an applicable requirement.

PTE of the Entire Source After Issuance of the FESOP Revision

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Coating Line (B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	90.00	-	-	22.00	8.90 (Glycol ethers)
Natural Gas Combustion	~~0.17~~ **0.20**	~~0.68~~ **0.78**	~~0.68~~ **0.78**	~~0.05~~ **0.06**	~~8.92~~ **10.3**	~~0.49~~ **0.57**	~~7.49~~ **8.66**	~~10,770~~ **12,450**	~~0.17~~ **0.19**	~~0.16~~**0.19** (Hexane)
Powder Coating	1.48	1.48	1.48	-	-	-	-	-	-	-
Welding stations	0.12	0.12	0.12	-	-	-	-	-	0.01	0.01 (Mn)
Aluminum Sawing	0.01	0.01	0.01	-	-	-	-	-	-	-
Anodizing Tanks	2.27	2.27	2.27	-	-	1.93	-	-	-	-
Paint Pre-treat Cleaners	-	-	-	-	-	-	-	-	0.18	0.18 (HF)
Thermal Fill	-	-	-	-	-	2.77	-	-	1.02	1.02 (MDI)
Paved Roads	0.30	0.06	0.01	-	-	-	-	-	-	-
Total PTE of Entire Source	~~83.03~~ **83.06**	~~83.30~~ **83.41**	~~83.26~~ **83.36**	~~0.05~~ **0.06**	~~8.92~~ **10.3**	~~95.19~~ **95.27**	~~7.49~~ **8.66**	~~10,770~~ **12,450**	~~23.38~~ **23.41**	8.90 (Glycol Ethers)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	**250**	250*******	250	250	250	100,000 CO_2e	NA	NA
~~Nonattainment NSR Major Source Thresholds~~	~~NA~~	~~NA~~	~~100~~	~~NA~~	~~NA~~	~~NA~~	~~NA~~	~~NA~~	~~NA~~	~~NA~~

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
*****This source is not located in one of the townships considered as nonattainment for SO_2.**

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Coating Line (B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	90.00	-	-	22.00	8.90 (Glycol ethers)
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.3	0.57	8.66	12,450	0.19	0.19 (Hexane)
Powder Coating	1.48	1.48	1.48	-	-	-	-	-	-	-
Welding stations	0.12	0.12	0.12	-	-	-	-	-	0.01	0.01 (Mn)
Aluminum Sawing	0.01	0.01	0.01	-	-	-	-	-	-	-
Anodizing Tanks	2.27	2.27	2.27	-	-	1.93	-	-	-	-
Paint Pre-treat Cleaners	-	-	-	-	-	-	-	-	0.18	0.18 (HF)
Thermal Fill	-	-	-	-	-	2.77	-	-	1.02	1.02 (MDI)
Paved Roads	0.30	0.06	0.01	-	-	-	-	-	-	-
Total PTE of Entire Source	**83.06**	**83.41**	**83.36**	**0.06**	**10.3**	**95.27**	**8.66**	**12,450**	**23.41**	**8.90 (Glycol Ethers)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	250	250***	250	250	250	100,000 CO_2e	NA	NA

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
***This source is not located in one of the townships considered as nonattainment for SO_2.

(a) FESOP Status
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants, HAPs and CO_2e from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

(b) PSD Minor Source – PM
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) There are no NSPS (326 IAC 12 and 40 CFR Part 60) applicable to this proposed amendment.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(b) There are no NESHAP (326 IAC 14, 326 IAC 20, and 40 CFR Part 63) applicable to this proposed amendment.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

(a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed amendment is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

(1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4:

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

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

(g) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
RTO #1 is not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, it does not meet the definition of an indirect heating unit.

(h) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
RTO #1 is 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.

(i) 326 IAC 6.5 (PM Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from RTO#1 shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(j) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
RTO #1 is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide is less than twenty-five (25) tons per year and ten (10) pounds per hour.

(k) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
RTO #1 is not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there are no applicable emission limits for the source under 326 IAC 9-1-2.

(l) 326 IAC 10-1-1 (Nitrogen Oxides Control)
RTO #1 is not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because it has potential to emit NO_x less than forty (40) tons per year

Compliance Determination, Monitoring and Testing Requirements

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

Control	Operating Parameters	Frequency
Regenerative thermal oxidizer (RTO #1)	Temperature	Continuous and 3-hour rolling average
	Fan amperage	Once per day

These monitoring conditions are necessary because the regenerative thermal oxidizer for the Coating Line must operate properly to comply with 326 IAC 2-8-4 (FESOP), 326 IAC 8-2-9 (Miscellaneous Metal Coating), and 40 CFR Part 63, Subpart HHHHHH (6H), and render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

(b) The testing requirements applicable to this proposed revision are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6, Drying Oven: OV-1)	Regenerative thermal oxidizer (RTO #1)	VOC and HAPs	180 days after issuance of this revision	Once every 5 years

The four (4) spray booths (B-1, B-2, B-5, and B-6) are controlled by the catalytice themal oxidizer (CAT-Ox #1) and regnerative thermal oxidizer (RTO #1) operating in series. The drying oven (OV-1) is controlled by only the regnerative thermal oxidizer (RTO #1). The minimum overall combined efficiency of the Cat-Ox #1 and RTO #1 is 74.6% in order for the worst-case coating to comply with 326 IAC 8-2-9, see Calculations in Appendix A of this TSD. The last valid compliance demonstration was conducted on June 29, 2010.

IDEM determined that for the HAP testing, the source can test the specific HAP with the expected lowest destruction efficiency, instead of testing all HAPs. This efficiency can then be used for the other HAPs.

Proposed Changes

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

(1) Description of RTO #1 has been added to Section A.2, D.1, E.1.

(2) The drying oven has been moved from insignificant activities listed in Section A.3 to Section A.2 because it is part of the Coating Line controlled by the RTO #1.

(3) Language specifying the combined overall control of the Cat-Ox#1 and RTO#1 has been added to the limits in Conditions D.1.1 and D.1.2.

(4) Compliance determination, testing, monitoring, and record keeping requirements for RTO #1 have been added to Conditions D.1.6, D.1.8, D.1.13, D.1.14, and D.1.16, respectively.

(5) Temperature monitoring requirements for Cat-Ox#1 have been removed because Cat-Ox#1 no longer oxidizes VOC and HAPs, but only concentrates VOC and HAPs for oxidization in RTO#1.

Additional Changes

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

(1) Nonattainment status for $PM_{2.5}$ has been removed from Section A.1.

(2) Language specifying that the thermal oxidizers and drying oven are subject to 326 IAC 6.5 has been added to Condition D.2.1.

(3) To facilitate HAPs testing, the language has been changed in Condition D.1.8 to test for the single HAP that has the lowest destruction efficiency, which will be assumed to be the lowest destruction efficiency for all HAPs.

. . .

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

The Permittee owns and operates a stationary fabrication, anodizing, and surface coating of architectural metal products plant.

Source Address:	9850 East 30th Street, Indianapolis, Indiana 46229
General Source Phone Number:	(317) 538-1685
SIC Code:	3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)
County Location:	Marion
Source Location Status:	~~Nonattainment for $PM_{2.5}$ standard~~ Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

One (1) Coating Line, installed in 1989, **modified in 2013 to add a secondary control device,**

utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

(c) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

These four **(4)** booths use dry filters for particulate matter overspray control,

These four (4) booths are contained within a total enclosure paint tunnel maintained under negative pressure, and use **the following control devices operating in series for VOC control:**

(1) ~~a~~**One (1)** natural gas fired catalytic thermal oxidizer ~~for VOC control~~, identified as Cat-Ox #1, with a maximum heat input of 0.4 million Btu per hour, and exhausting ~~at one (1) stack, identified as S-OX~~ **to RTO#1**.

Note: Cat-Ox #1 is used only for concentrating VOC and HAPs from the paint spray booths. Oxidization does not occur in Cat-Ox#1.

(2) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO #1, constructed in 2014, with a maximum heat input of 3.24 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Note: Drying Oven (OV-1) is not controlled by Cat-Ox#1, and exhausts directly to RTO #1.

Under 40 CFR 63, Subpart HHHHHH (6H), the coating line is considered part of an affected source.

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

This stationary source also includes the following insignificant activities:

(a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

~~(1) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;~~

(~~2~~**1**) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input capacity of 6.3 million Btu per hour;

(~~3~~**2**) Three (3) natural gas fired space heaters, identified as H1 through H3, each with a maximum heat input capacity of 0.1 million Btu per hour;

(~~4~~**3**) Four (4) natural gas fired HVAC units, identified as HVAC-1 through HVAC-4, each with a maximum heat input capacity of 0.048 million Btu per hour;

(~~5~~**4**) One (1) natural gas fired air make up unit, identified as AM-1, with a maximum heat input capacity of 5.0 million Btu per hour;

(~~6~~**5**) One (1) natural gas fired air make up unit, identified as AM-2, with a maximum heat input capacity of 3.0 million Btu per hour;

(~~7~~**6**) One (1) natural gas fired process tank heater, identified as S-10, with a maximum heat input capacity of 1.0 million Btu per hour;

(~~8~~**7**) One (1) natural gas fired dry off oven, identified as OV-2, with a maximum heat input capacity of 1.0 million Btu per hour; and

(~~9~~**8**) One (1) natural gas fired steam boiler with a maximum heat input capacity of 0.382 million Btu per hour.

. . .

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) Coating Line, installed in 1989, **modified in 2013 to add a secondary control device,** utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

(c) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

These four **(4)** booths use dry filters for particulate matter overspray control,

These four (4) booths are contained within a total enclosure paint tunnel maintained under negative pressure, and use **the following control devices operating in series for VOC control:**

(1) ~~a~~**One (1)** natural gas fired catalytic thermal oxidizer ~~for VOC control~~, identified as Cat-Ox #1, with a maximum heat input of 0.4 million Btu per hour, and exhausting ~~at one (1) stack, identified as S-OX~~ **to RTO#1**.

Note: Cat-Ox #1 is used only for concentrating VOC and HAPs from the paint spray booths. Oxidization does not occur in Cat-Ox#1.

(2) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO #1, constructed in 2013, with a maximum heat input of 3.24 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Note: Drying Oven (OV-1) is not controlled by Cat-Ox#1, and exhausts directly to RTO #1.

Under 40 CFR 63, Subpart HHHHHH (6H), the coating line is considered part of an affected source.

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

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

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

. . .

(d) The catalytic thermal oxidizer (Cat-Ox #1) **and regenerative thermal oxidizer (RTO #1) in series** shall control the VOC and HAPs emissions from the Coating Line and the overall **combined** control efficiency of the catalytic thermal oxidizer (Cat-Ox #1) **and regenerative thermal oxidizer (RTO #1)** shall be greater than or equal to 74.6%.

. . .

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

. . .

(c) Pursuant to 326 IAC 8-1-2(c) the overall **combined** control efficiency of **the in-series combination of the** catalytic thermal oxidizer (Cat-Ox #1) **and regenerative thermal oxidizer (RTO #1)** shall be no less than the equivalent overall efficiency calculated by the following equation:

. . .

The overall **combined** control efficiency of the **in-series combination of the** catalytic thermal oxidizer (Cat-Ox #1) **regenerative thermal oxidizer (RTO #1)** shall be greater than or equal to 74.6%.

. . .

Compliance Determination Requirements

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

Pursuant to 326 IAC 8-1-2(a) and to comply with Conditions D.1.1 and D.1.2, the Permittee shall operate the paint tunnel total enclosure and **the in-series combination of the** catalytic thermal oxidizer (Cat-Ox #1) **and regenerative thermal oxidizer (RTO #1)** at all times the coating line is in operation.

. . .

D.1.8 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform inlet and outlet VOC~~, single HAPs,~~ and ~~combined~~ HAPs testing of the **in-series combination of the** catalytic thermal oxidizer (Cat-Ox #1) **and regenerative thermal oxidizer (RTO #1)**, utilizing methods approved by the Commissioner **not later than one hundred and eighty (180) days after the issuance of Significant Permit Revision, 097-34743-00127. Testing for HAPs shall be for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM**. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

. . .

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

~~D.1.11 Catalytic Thermal Oxidizer (Cat-Ox #1) Temperature~~

~~(a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic thermal oxidizer (Cat-Ox #1) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average and shall not be less than 650°F, or the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the limits in Conditions D.1.1 and D.1.2.~~

~~(b) When for any one reading, the 3-hour average temperature of the catalytic thermal oxidizer (Cat-Ox #1) is below the 3-hour average temperature as stated in (a), the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour average temperature that is below this value is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.~~

D.1.~~12~~**11** Catalytic Thermal Oxidizer (Cat-Ox #1) Induced Fan Amperage

. . .

D.1.12 Regenerative Thermal Oxidizer (RTO #1) Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour rolling average. From the date of startup until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour rolling average temperature of 1,400°F.

(b) The Permittee shall determine the 3-hour rolling average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2.

(c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour rolling average temperature as observed during the compliant stack test.

D.1.13 Regenerative Thermal Oxidizer (RTO #1) Fan Amperage

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.1.~~13~~**14** Dry Filter Monitoring

. . .

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

D.1.~~14~~**15** Record Keeping Requirements

. . .

(b) To document the compliance status with Conditions D.1.11 and D.1.12, the Permittee shall maintain the following:

~~(1) Continuous temperature records (on a 3-hour rolling average basis) for the catalytic thermal oxidizer (Cat-Ox #1) and the 3-hour rolling average temperature used to demonstrate compliance during the most recent compliant stack test.~~

(~~2~~**1**) Records of the fan amperage for the concentrator fan taken once per day. The Permittee shall include in its daily record when a fan amperage reading is not taken and the reason for the lack of fan amperage reading (e.g., the process did not operate that day).

(~~3~~**2**) Records of the fan amperage for the catalytic thermal oxidizer (Cat-Ox #1) fan taken once per day. The Permittee shall include in its daily record when a fan amperage reading is not taken and the reason for the lack of fan amperage reading (e.g., the process did not operate that day).

(c) To document the compliance status with Conditions D.1.12 and D.1.13, the Permittee shall maintain the following:

(1) Continuous temperature records (on a 3-hour rolling average basis) for the regenerative thermal oxidizer (RTO #1) and the 3-hour rolling average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) Records of the fan amperage for the regenerative thermal oxidizer (RTO #1) fan taken once per day. The Permittee shall include in its daily record when a fan amperage reading is not taken and the reason for the lack of fan amperage reading (e.g., the process did not operate that day).

(~~c~~**d**) To document compliance with Condition D.1.~~13~~**14**, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.

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

D.1.~~15~~**16** Reporting Requirements

. . .

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The following insignificant activities as defined in 326 IAC 2-7-1(21):

(a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

~~(1) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;~~

(~~2~~**1**) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input capacity of 6.3 million Btu per hour;

(~~3~~**2**) Three (3) natural gas fired space heaters, identified as H1 through H3, each with a maximum heat input capacity of 0.1 million Btu per hour;

(**43**) Four (4) natural gas fired HVAC units, identified as HVAC-1 through HVAC-4, each

with a maximum heat input capacity of 0.048 million Btu per hour;

(~~5~~**4**) One (1) natural gas fired air make up unit, identified as AM-1, with a maximum heat input capacity of 5.0 million Btu per hour;

(~~6~~**5**) One (1) natural gas fired air make up unit, identified as AM-2, with a maximum heat input capacity of 3.0 million Btu per hour;

(~~7~~**6**) One (1) natural gas fired process tank heater, identified as S-10, with a maximum heat input capacity of 1.0 million Btu per hour;

(~~8~~**7**) One (1) natural gas fired dry off oven, identified as OV-2, with a maximum heat input capacity of 1.0 million Btu per hour; and

(~~9~~**8**) One (1) natural gas fired steam boiler with a maximum heat input capacity of 0.382 million Btu per hour.

. . .

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

D.2.1 Particulate [326 IAC 6.5-1-2]

. . .

(2) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from all other natural gas combustion units **(including Cat-Ox#1, RTO#1, and OV-1 listed in Section D.1)** shall not exceed three-hundredth (0.03) grain per dry standard cubic foot (dscf).

. . .

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) Coating Line, installed in 1989, **modified in 2013 to add a secondary control device,** utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts, with maximum capacity of 1,500 metal parts per hour, with an average conveyor line speed of six (6) feet per minute, and consisting of:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, each with a maximum surface coating capacity of six (6) gallons of primer per hour; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, each with a maximum surface coating capacity of three (3) gallons of coatings per hour.

(c) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input capacity of 3.2 million Btu per hour;

These four **(4)** booths use dry filters for particulate matter overspray control,

These four (4) booths are contained within a total enclosure paint tunnel maintained under negative pressure, and use **the following control devices operating in series for VOC control:**

(1) ~~a~~**One (1)** natural gas fired catalytic thermal oxidizer ~~for VOC control~~, identified

as Cat-Ox#1, with a maximum heat input of 0.4 million Btu per hour, and exhausting ~~at one (1) stack, identified as S-OX~~ **to RTO#1**.

Note: Cat-Ox #1 is used only for concentrating VOC and HAPs from the paint spray booths. Oxidization does not occur in Cat-Ox#1.

(2) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO #1, constructed in 2013, with a maximum heat input of 3.24 million Btu per hour, and exhausting at one (1) stack, identified as S-OX.

Note: Drying Oven (OV-1) is not controlled by Cat-Ox#1, and exhausts directly to RTO #1.

Under 40 CFR 63, Subpart HHHHHH (6H), the coating line is considered part of an affected source.

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

. . .

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 July 18, 2014.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 097-34743-00127. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Ryan Graunke 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

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

Appendix A: Emissions Calculations
Summary of Emissions

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Unlimited Potential to Emit (tons/yr)

Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Combined HAPs	Single HAP	
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	462.9	-	-	355.1	76.75	Glycol Ethers
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.3	0.57	8.66	12,450	0.19	0.19	Hexane
Powder Coating	1.56	1.56	1.56	-	-	-	-	-	-	-	-
Welding	0.12	0.12	0.12	-	-	-	-	-	0.01	0.01	Mn
Aluminum Sawing	0.01	0.01	0.01	-	-	-	-	-	-	-	-
Anodizing Tanks	2.27	2.27	2.27	-	-	1.93	-	-	-	-	-
Paint Pre-treat Cleaners	-	-	-	-	-	-	-	-	0.18	0.18	HF
Thermal Fill	-	-	-	-	-	2.77	-	-	1.02	1.02	MDI
Paved Roads	0.30	0.06	0.01	-	-	-	-	-	-	-	-
Total	**83.06**	**83.41**	**83.36**	**0.06**	**10.31**	**468.20**	**8.66**	**12,450**	**356.53**	**76.75**	**Glycol Ethers**

Limited Potential to Emit (tons/yr)

Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHGs as CO_2e	Combined HAPs	Single HAP	
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)	78.61	78.61	78.61	-	-	90.00	-	-	22.00	8.90	Glycol Ethers
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.31	0.57	8.66	12,450	0.195	0.186	Hexane
Powder Coating	1.56	1.56	1.56	-	-	-	-	-	-	-	-
Welding	0.12	0.12	0.12	-	-	-	-	-	0.01	0.01	Mn
Aluminum Sawing	0.01	0.01	0.01	-	-	-	-	-	-	-	-
Anodizing Tanks	2.27	2.27	2.27	-	-	1.93	-	-	-	-	-
Paint Pre-treat Cleaners	-	-	-	-	-	-	-	-	0.18	0.18	HF
Thermal Fill	-	-	-	-	-	2.77	-	-	1.02	1.02	MDI
Paved Roads	0.30	0.06	0.01	-	-	-	-	-	-	-	-
Total	**83.06**	**83.41**	**83.36**	**0.06**	**10.31**	**95.27**	**8.66**	**12,450**	**23.41**	**8.90**	**Glycol Ethers**

Appendix A: Emissions Calculations
Coating Line - VOC and PM (Unlimited)

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hour)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Binks Spray Booth	B-1	KY1C17839 (As supplied)	10.6	45.0%	0.0%	45.0%	0.0%	26.00%										
		As applied	**10.1**	**56.0%**	**0.0%**	**56.0%**	**0.0%**	**26.00%**	**0.0040**	**1500.0**	**5.66**	**5.66**	**21.75**	**33.9**	**814.5**	**148.6**	**29.2**	**75%**
Binks Spray Booth	B-2	KY1C17839 (As supplied)	10.6	45.0%	0.0%	45.0%	0.0%	26.00%										
		As applied	**10.1**	**56.0%**	**0.0%**	**56.0%**	**0.0%**	**26.00%**	**0.0040**	**1500.0**	**5.66**	**5.66**	**21.75**	**33.9**	**814.5**	**148.6**	**29.2**	**75%**
Telkamp Spray Booth	B-5	KW3C19694 (As supplied)	9.7	59.0%	0.0%	59.0%	0.0%	24.00%										
		As applied	**9.4**	**67.2%**	**0.0%**	**67.2%**	**0.0%**	**24.00%**	**0.0020**	**1500.0**	**6.30**	**6.30**	**26.26**	**18.9**	**453.8**	**82.8**	**10.1**	**75%**
Telkamp Spray Booth	B-6	KW3C19694 (As supplied)	9.7	59.0%	0.0%	59.0%	0.0%	24.00%										
		As applied*	**9.4**	**67.2%**	**0.0%**	**67.2%**	**0.0%**	**24.00%**	**0.0020**	**1500.0**	**6.30**	**6.30**	**26.26**	**18.9**	**453.8**	**82.8**	**10.1**	**75%**
		KC3C19704 (As supplied)	9.1	72.0%	0.0%	72.0%	0.0%	39.00%										
		As applied	**9.3**	**77.6%**	**0.0%**	**77.6%**	**0.0%**	**39.00%**	**0.0010**	**1500.0**	**7.22**	**7.22**	**18.50**	**10.8**	**259.8**	**47.4**	**3.4**	**75%**
													Total:	**105.7**	**2536.6**	**462.9**	**78.6**	

Notes
As applied assumes the use of worst case diluent (glycol ether).
* Booth 6 - coatings are mutually exclusive. Worst case scenario (KWC3C19694) used to determine potential to emit.

Methodology:
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

Compliance with 326 IAC 8-2-9

Emission Unit	Emission Unit ID	Material	Equivalent emission limit (lb VOC/gal coating solids)	VOC content (lb/gal coating solids)	Overall control efficiency
Binks Spray Booth	B-1	KY1C17839	6.67	21.75	69.3%
Binks Spray Booth	B-2	KY1C17839	6.67	21.75	69.3%
Telkamp Spray Booth	B-5	KW3C19694	6.67	26.26	74.6%
Telkamp Spray Booth	B-6	KW3C19694	6.67	26.26	74.6%
		KC3C19704	6.67	18.50	63.9%

Note:
The minimum combined control efficiency of the catalytic thermal oxidizer and regenerative thermal oxidizer shall be greater than or equal to 74.6%

Methodology:
Pursuant to 8-1-2(b)(1), the equivalent VOC emissions limit is 4.02 lb VOC/gal of coating solids, as applied, calculated using the equation: E = L/(1-L/D)
Where: E = Equivalent emission limit in lb VOC/gal of coating solids, as applied
L = Emission limit from 326 IAC 8-2-9 (3.5 lb VOC/gal of coating less water)
D = Baseline solvent density of VOC in coating (7.36 lb VOC/gal of solvent)
Pursuant to 8-1-2(c), the overall efficiency of the thermal oxidizer is calculated using the equation: O=(V-E)/V*100
Where: O = Equivalent overall efficiency of the thermal oxidizer as a percentage
V = The weighted average VOC contents of all coatings in lb VOC/gal of coating solids, as applied
E = Equivalent emission limit = (6.67 lb VOC/gal of coating solids, as applied)

Appendix A: Emission Calculations
Coating Line - HAPs (Unlimited)

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum throughput (unit/hour)	Xylene		Toluene		Methyl Isobutyl Ketone		Ethyl Benzene		Dimethyl phthalate		Glycol Ethers		Chromium Compounds	
						Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)	Weight %	PTE (ton/yr)
Binks Spray Booth	B-1	KY1C17839	10.1	0.004000	1500.00	11.00%	29.20	8.60%	22.83	3.90%	10.35	2.60%	6.90	9.10%	24.15	11.30%	29.99	0.80%	2.12
Binks Spray Booth	B-2	KY1C17839	10.1	0.004000	1500.00	11.00%	29.20	8.60%	22.83	3.90%	10.35	2.60%	6.90	9.10%	24.15	11.30%	29.99	0.80%	2.12
Telkamp Spray Booth	B-5	KW3C19694	9.4	0.002000	1500.00	6.50%	8.01	7.30%	9.00	10.20%	12.57	1.50%	1.85	9.90%	12.20	6.80%	8.38	-	-
Telkamp Spray Booth	B-6	KW3C19694*	9.4	0.002000	1500.00	6.50%	8.01	7.30%	9.00	10.20%	12.57	1.50%	1.85	9.90%	12.20	6.80%	8.38	-	-
		KC3C19704	9.3	0.001000	1500.00	9.50%	5.80	5.10%	3.12	11.70%	7.15	2.20%	1.34	14.00%	8.55	4.80%	2.93	-	-
					Totals:		**74.4**		**63.6**		**45.8**		**17.5**		**72.7**		**76.7**		**4.2**
																	Combined HAPs:		**355.1**

Notes
As applied assumes the use of worst case diluent (glycol ether).
* Booth 6 - coatings are mutually exclusive. Worst case scenario (KWC3C19694) used to determine potential to emit.

Methodology:
PTE of HAPs (ton/yr) = Density (lb/gal) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * Weight % HAPs * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Coating Line - PM and HAPs Limits

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Emission Unit	Limited PTE (ton/yr)			Control efficiency	Usage Limits (ton/yr)		
	VOC	Single HAP	Combined HAPs		VOC	Single HAP	Combined HAPs
Coating Line (Spray Booths: B-1, B-2, B-5, and B-6)	90.0	8.90	22.0	74.6%	354.20	35.03	86.58

Notes:
PTE of VOC and HAPs are conservatively limited in order for total PTE of the coating line, natural gas combustion, and insignificant units remain below Title V Major threshold.
Control efficiency is the minimum overall efficiency required to comply with 326 IAC 8-2-9 (Page 2 of this appendix).

Methodology:
VOC usage limit (ton/yr) = Limited PTE of VOC (ton/yr) / (1-Control efficiency)
Combined HAPs usage limit (ton/yr) = Limited PTE of combined HAPs of VOC (ton/yr) / (1-Control efficiency)
Single HAP usage limit (ton/yr) = Limited PTE of single HAPs of VOC (ton/yr) / (1-Control efficiency)

Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Emission unit	Emission Unit ID	Number of Units	Heat Input Capacity Each (MMBtu/hr/unit)	Total Potential Throughput (MMCF/yr)
Catalytic thermal oxidizer	Cat-OX #1	1	0.400	3.4
Regenerative thermal oxidizer	RTO #1	1	3.240	27.8
Spray booth drying oven	OV-1	1	3.200	27.5
Boiler	-	1	6.300	54.1
Space heaters	H1 - H3	3	0.100	2.6
HVAC units	HVAC-1 - HVAC-4	4	0.048	1.6
Air make up unit	AM-1	1	5.000	42.9
Air make up unit	AM-2	1	3.000	25.8
Process tank heater	S-10	1	1.000	8.6
Dry-off oven	OV-2	1	1.000	8.6
Steam boiler	-	1	0.382	3.3
		Totals:	**24.014**	**206.2**

	Pollutant						
	PM*	PM_{10}*	Direct $PM_{2.5}$*	SO_2	NO_x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission (tons/yr)	0.20	0.78	0.78	0.06	10.3	0.57	8.66

*PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM_{10} combined. $PM_{2.5}$ emission factor is filterable and condensable $PM_{2.5}$ combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission (tons/yr)	2.165E-04	1.237E-04	7.734E-03	1.856E-01	3.506E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission (tons/yr)	5.156E-05	1.134E-04	1.444E-04	3.919E-05	2.165E-04
				Combined HAPs:	**1.946E-01**

	Greenhouse Gas		
	CO_2	CH_4	N_2O
Emission Factor (lb/MMSCF)	120,000	2.3	2.2
Potential Emission (tons/yr)	12,374	0.2	0.2
Summed Potential Emissions (tons/yr)	12,375		
CO_2e Total (tons/yr)	12,450		

Notes:
MMBtu = 1,000,000 Btu
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
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Methodology:
Total Heat Input Capacity (MMBtu/hr) = ∑ (Heat Input Capacity Each (MMBtu/hr/unit) * Number of Units)
Potential Throughput (MMCF/yr) = Heat Input Capacity Each (MMBtu/hr) * Number of Units * 8,760 hrs/yr * High Heat Value (1 MMCF/1,020 MMBtu)
Potential Emission (tons/yr) = Total Max Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs
CO_2e (tons/yr) = CO_2 Potential Emission (tons/yr) * CO_2 GWP (1) + CH_4 Potential Emission (tons/yr) * CH_4 GWP (21) + N_2O Potential Emission (tons/yr) * N_2O GWP (310).

Appendix A: Emissions Calculations
Powder Coating

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Products	Annual usage (lb/yr)	Annual hours operated	Max usage rate (lb/hr)	Weight % solids	Transfer efficiency	Control efficiency
04 Brick Red UD Polyester	6500	182.5	35.6	100%	99%	95.0%

	lb/hr	lb/day	ton/yr
Uncontrolled PTE of PM	0.36	8.55	1.56
Controlled PTE of PM	0.02	0.43	0.08

Note:
These calculations are based on additional information provided by the source on June 19, 2013
Assume PM = PM_{10} = $PM_{2.5}$
Max usage is based on using 6500 lb of powder/yr at a half hour/day averaged over 365 days/yr
According to the environmental data sheet provided by the source, the powder coating contains no VOC or HAPs

Methodology:
Max usage rate (lb/hr) = Annual usage (lb/yr) / Annual hours operated
Uncontrolled PTE of PM (lb/hr) = Max usage rate (lb/hr) * Weight % solids * (1 - Transfer efficiency)
Controlled PTE of PM (lb/hr) = Uncontrolled PTE of PM (lb/hr) * (1 - Control efficiency)
PTE (lb/day) = PTE (lb/hr) * 24 hrs/day
PTE (ton/yr) = PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Welding

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit No.: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Process	Max electrode usage (lb/hr)	Emission Factors (lb pollutant/lb electrode)		PTE (lb/hr)		PTE (lb/day)		PTE (ton/yr)	
		PM	Mn	PM	Mn	PM	Mn	PM	Mn
Metal Inert Gas (MIG) (carbon steel)	5.0	0.0055	0.0005	0.028	0.003	0.660	0.060	0.120	0.011

Notes:
These calculations are based on additional information provided by the source on June 19, 2013
Assume PM = PM_{10} = $PM_{2.5}$
There are three MIG stations: 2 with a max usage of 1.0 lb electrode/hr and 1 with a max usage of 3.0 lb electrode/hr
Emission factors are default values for carbon steel
Emission factors are from AP-42 Tables 12.19-1 and 12.19-2

Methodology:
Max electrode usage (lb/hr) = Actual electrode usage / Actual operation hours (hr/yr)
Emissions (lb pollutant//hr) = Max electrode usage (lb/hr) * Emission factor (lb pollutant/lb electrode)
PTE (lb/hr) = Max electrode usage (lb/hr) * Emission factor (lb pollutant/lb electrode)
PTE (lb/day) = Max electrode usage (lb/hr) * Emission factor (lb pollutant/lb electrode) * 24 hrs/day
PTE (ton/yr) = Max electrode usage (lb/hr) * Emission factor (lb pollutant/lb electrode) * 8760 hr/yr * 1 ton/2000 hr

Appendix A: Emissions Calculations
Aluminum Sawing

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Sawing component	Maximum line speed (linear ft/hr)	Max size processed (ft^3/linear ft)	Maximum throughput (ft^3/hr)	Maximum throughput (ton/hr)	Emission factor (lb PM/ton aluminum)	PTE of PM (lb/hr)	PTE of PM (lb/day)	PTE of PM (ton/yr)
Vertical band saw	61.5	0.0556	3.42	0.289	0.0045	0.0013	0.0312	0.0057
Horizontal band saw	24.0	0.0556	1.33	0.113	0.0045	0.0005	0.0122	0.0022
					Totals:	**0.0018**	**0.0433**	**0.0079**

Notes:
These calculations are based on additional information provided by the source on June 19, 2013
Assume PM = PM_{10} = $PM_{2.5}$
Density of aluminum is 169 lb/ft^3, as reported by the source
Emission factor is from FIRE 6.01 SCC#3-04-003-60 (Casting finishing for gray iron foundries).

Methodology:
Aluminum processed (ft^3/linear ft) = 96 in3 * (1 ft^3/1728 in^3)
Maximum throughput (ft^3/hr) = Maximum line speed (linear ft/hr) * Aluminum processed (ft^3/linear ft)
Maximum throughput (ton/hr) = Maximum throughput (ft^3/hr) * Aluminum density (169 lb/ft^3)
PTE of PM (lb/hr) = Maximum throughput (ton/hr) * Emission factor (lb PM/ton aluminum)
PTE of PM (lb/day) = PTE of PM (lb/hr) * 24 hrs/day
PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Anodizing tanks

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Products	Max throughput (gal/hr)	Density (lb/gal)	Max throughput (lb/hr)	Weight % VOC	Surface area of tank (ft^2)	PM emission factor (grains/ft^2-hr)	PTE of PM (lb/hr)	PTE of PM (lb/day)	PTE of PM (ton/yr)	PTE of VOC (ton/yr)
HOUGHTO-ETCH AX-2050[1]	N/A	N/A	4.86	0%	144	4.2	0.09	2.07	0.38	-
HOUGHTO-COLOR A-599	1.08	9.67	10.45	0%	144	4.2	0.09	2.07	0.38	-
HOUGHTO-SEAL A-620	0.8	9.09	7.27	0%	144	4.2	0.09	2.07	0.38	-
HOUGHTO-CLEAN A-1041[1,2]	N/A	N/A	4.41	10%	144	4.2	0.09	2.07	0.38	1.93
HOUGHTO-CLEAN A-1083[1]	N/A	N/A	3.41	0%	144	4.2	0.09	2.07	0.38	-
HOUGHTO-DEOX A-1745L	0.42	11.55	4.85	0%	144	4.2	0.09	2.07	0.38	-
						Total:	**0.52**	**12.44**	**2.27**	**1.93**

Note:
These calculations are based on additional information provided by the source on June 19, 2013
Assume PM = PM_{10} = $PM_{2.5}$
PM emission factor is from AP-42 Section 12.20, Table 12.20-2 for chromic acid anodizing.
Materials contain no HAPs, according to MSDSs provided by the source
Tanks are each 36 ft by 4 ft
[1] These products are powder. Therefore, throughput was provided as lb/hr
[2] HOUGHTON-CLEAN A-1041 is 10% (max) hexylene gycol, which is assumed to be emitted as VOC, worst-case, when dissolved in the bath

Methodology:
Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal)
Max throughput (lb/hr) = Max throughput (gal/hr) * Density (lb/gal)
PTE of PM (lb/hr) = Surface area of tank (ft^2) * PM emission factor (grains/ft^2-hr) * 1 lb/7000 grains
PTE of PM (lb/day) = PTE of PM (lb/hr) * 24 hrs/day
PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of VOC (ton/yr) = Max throughput (lb/hr) * Weight % VOC * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Paint Pre-treat Cleaners

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Products	Max usage (lb/hr)	Weight % HAPs (HF)	PTE of HAPs (HF) (ton/yr)
HOUGHTO-COAT A-840	0.14	30%	0.18
HOUGHTO-CLEAN A-801	0.14	0%	0
HOUGHTO-COAT A-830	0.14	0%	0

Note:
These calculations are based on additional information provided by the source on June 19, 2013
Cleaning is a dip system, therefore there are no particulate emissions.
Cleaners contain no VOC, according to MSDSs provided by the source
HF = Hydrofluoric acid

Methodology:
PTE of HAPs (ton/yr) = Max usage (lb/hr) * Weight % HAPs (HF) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Thermal Fill

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit Number: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

Products	Max usage (gal/yr)	Density (lb/gal)	Weight % VOC	Weight % HAP (MDI)	PTE of VOC (ton/yr)	PTE of HAP (MDI) (ton/yr)
TB 100-30 Component A	440.0	10.34	100%	45%	2.27	1.02
TB 100-30 Component B	440.0	9.01	25%	0%	0.50	-
				Total:	2.77	1.02

Note:
These calculations are based on additional information provided by the source on June 19, 2013
The source uses a maximum of eight 55-gallon drums of each component per year
It is assumed that all of the VOC in the components is emitted to the atmosphere, worst-case
MDI is 4,4'-Diphenylmethane Diisocyanate (CAS # 101-68-8)

Methodology
PTE of VOC (ton/yr) = Max usage (gal/yr) * Density (lb/gal) * Weight % VOC * 1 ton/2000 lbs
PTE of HAP (MDI) (ton/yr) = Max usage (gal/yr) * Density (lb/gal) * Weight % HAP (MDI) * 1 ton/2000 lbs

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Superior Metal Technologies
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
Permit No.: 097-32751-00127
Significant Permit Revision Number: 097-34743-00127
Reviewer: Ryan Graunke

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

Vehicle Informtation (provided by source)

Type of trip	Max number of vehicles per day	Number of one-way trips per day per vehicle	Max one-way trips per day (trip/day)	Max weight loaded (tons/trip)	Total weight driven per day (ton/day)	Max one-way distance (feet/trip)	Max one-way distance (mi/trip)	Max one-way miles (mi/day)	Max one-way miles (mi/yr)
Vehicle (entering plant) (one-way trip)	3	1	3	25.3	75.9	800	0.152	0.5	165.9
Vehicle (leaving plant) (one-way trip)	3	1	3	17.0	51.0	800	0.152	0.5	165.9
		Totals:	**6**		**126.9**			**0.9**	**331.8**

Average vehicle weight per trip (tons/trip) = 21.2
Average miles per trip (miles/trip) = 0.15

Unmitigated emission factor (lb/mi), $E = k * (sL)^{0.91} * (W)^{1.02}$ (Equation 1 from AP-42 13.2.1)

	PM	PM_{10}	$PM_{2.5}$	
Where: k =	0.011	0.0022	0.00054	= particle size multiplier (lb/vehicle miles) (AP-42 Table 13.2.1-1)
W =	21.2	21.2	21.2	= average vehicle weight (tons)
sL =	9.7	9.7	9.7	= silt loading value (g/m^2) for paved roads at iron and steel production facilities - (AP-42 Table 13.2.1-3)

Mitigated emission factor takes natural mitigation due to precipitation into consideration
Mitigated emission factor (lb/mi), $E_{ext} = E * [1 - (p / 4*N)]$ (Equation 2 from AP-42 13.2.1)
where p = 125 = days of rain greater than or equal to 0.01 inches (see AP-42 Figure 13.2.1-2)
N = 365 = days per year

	PM	PM_{10}	$PM_{2.5}$
Unmitigated emission factor (lb/mi), E =	1.955	0.391	0.0960
Mitigated emission factor (lb/mi), E_{ext} =	1.788	0.358	0.0878

Type of trip	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM_{10} (tons/yr)	Unmitigated PTE of $PM_{2.5}$ (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM_{10} (tons/yr)	Mitigated PTE of $PM_{2.5}$ (tons/yr)
Vehicle (entering plant) (one-way trip)	0.162	0.032	0.0080	0.148	0.030	0.0073
Vehicle (leaving plant) (one-way trip)	0.162	0.032	0.0080	0.148	0.030	0.0073
Totals:	**0.324**	**0.065**	**0.016**	**0.297**	**0.059**	**0.015**

Methodology:
Max one-way trips per day (trip/day) = Max number of vehicles * Number of one-way trips per day per vehicle
Total weight driven per day (ton/day) = Max weight loaded (tons/trip) * Max one-way trips per day (trip/day)
Max one-way distance (mi/trip) = Max one-way distance (feet/trip) * 1 mi/5280 ft
Max one-way miles (mi/day) = Max one-way trips per day (trip/day) * Max one-way distance (mi/trip)
Max one-way miles (mi/yr) = Max one-way miles (mi/day) * 365 days/yr
Average vehicle weight per trip (ton/trip) = ∑ Total weight driven per day (ton/day) / ∑ Max trips per day (trip/day)
Average miles per trip (mi/trip) = ∑ Max one-way miles (miles/day) / ∑ Max trips per year (trip/day)
Unmitigated PTE (tons/yr) = Max one-way miles (miles/yr) * Unmitigated emission factor (lb/mile) * 1 ton/2000 lbs
Mitigated PTE (tons/yr) = Max one-way miles (miles/yr) * Mitigated emission factor (lb/mile) * 1 ton/2000 lbs

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Curt Lamb
Superior Metal Technologies
9850 E 30th St
Indianapolis, IN 46229

DATE: September 30, 2014

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

SUBJECT: Final Decision
FESOP - Significant Permit Revision
097 - 34743 - 00127

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:
Mack Overton Keramida Environmental
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

September 30, 2014

TO: Warren Library

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

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

Applicant Name: Superior Metal Technologies
Permit Number: 097 - 34743 - 00127

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	LPOGOST 9/30/2014 Superior Metal Technologies 097 - 34743 - 00127 final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Curt Lamb Superior Metal Technologies 9850 E 30th St Indianapolis IN 46229 (Source CAATS) Via confirmed delivery									
2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 *(Health Department)*									
3		Mr. Mack Overton Keramida Environmental, Inc. 401 North College Avenue Indianapolis IN 46202 *(Consultant)*									
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 *(Local Official)*									
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 *(Local Official)*									
6		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 *(Local Official)*									
7		Warren Library 9701 E 21st Street Indianapolis IN 46229 *(Library)*									
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.

FACSIMILIE OF PS Form 3877