



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: July 8, 2015

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

Source Name: PTI Quality Containment Solution

Permit Level: SSOA

Permit Number: 019-35874-00148

Source Location: 700 Patrol Road

Type of Action Taken: Initial Permit

## 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 35874.

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.



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**SOURCE SPECIFIC OPERATING AGREEMENT  
OFFICE OF AIR QUALITY**

**PTI Quality Containment Solution  
700 Patrol Road  
Jeffersonville, Indiana 47130**

(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 SSOA.

This SSOA is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-9 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this SSOA, are those applicable at the time the SSOA was issued. The issuance or possession of this SSOA shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Source Specific Operating Agreement (SSOA) under 326 IAC 2-9.

Source Specific Operating Agreement No. S019-35874-00148

Issued by:

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

Issuance Date: July 8, 2015



## SECTION A

## SOURCE SUMMARY

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

### A.1 General Information

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The Permittee owns and operates a stationary surface coating operation.

Source Address:	700 Patrol Road, Jeffersonville, Indiana 47130
General Source Phone Number:	(313) 365-3999
SIC Code:	5013 (Motor Vehicle Supplies and New Parts)
County Location:	Clark County (Utica Township)
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Source Specific Operating Agreement (SSOA) Not 1 of 28 Source Categories

### A.2 Source Summary

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This stationary source consists of the following:

- (a) Surface Coating or Graphic Arts Operation [326 IAC 2-9-3]
- (b) Parts Washing Operations;
- (c) Solvent Cleaning Operations; and
- (d) Natural gas-fired combustion units consisting of the following:
  - (1) Three (3) Process Heater Washer Tanks, identified as WH-1 through WH-3, each with a heat input capacity of 1.35 MMBtu/hr;
  - (2) One (1) Process Heater Washer Tank, identified as WH-4, with a heat input capacity of 5.30 MMBtu/hr;
  - (3) One (1) Process Heater Washer Tank, identified as Wh-5, with a heat input capacity of 2.00 MMBtu/hr;
  - (4) One (1) Axle Pre-Heat Oven, identified as APO-1, with a heat input capacity of 3.00 MMBtu/hr;
  - (5) One (1) Axle Cure Oven, identified as APO-2, with a heat input capacity of 3.50 MMBtu/hr;
  - (6) One (1) Drive Shaft Pre-Heat Oven, identified as DSO-1, with a heat input capacity of 2.50 MMBtu/hr; and
  - (7) One (1) Drive Shaft Cure Oven, identified as DSO-2, with a heat input capacity of 2.50 MMBtu/hr.

### A.3 SSOA Applicability [326 IAC 2-9-1]

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- (a) This source, otherwise required to have a permit under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-7, or 326 IAC 2-8, has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Source Specific Operating Agreement (SSOA) under 326 IAC 2-9.
- (b) Pursuant to 326 IAC 2-9-1(g), the source may apply for up to four (4) different SSOAs contained in 326 IAC 2-9.

## SECTION B

## GENERAL CONDITIONS

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

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

### B.2 Enforceability

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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.3 Severability

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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.4 Property Rights or Exclusive Privilege

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

### B.5 Duty to Provide Information

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- (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.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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- (a) All terms and conditions of permits established prior to SSOA No. S019-35874-00148 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

### B.7 Annual Notification [326 IAC 2-9-1(d)]

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Pursuant to 326 IAC 2-9-1(d):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this SSOA.
- (b) The annual notice shall be submitted in the format attached no later than January 30 of each year to:

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

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

**B.8 Source Modification Requirement [326 IAC 2-9-1(e)]**

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Pursuant to 326 IAC 2-9-1(e), before the Permittee modifies its operations in such a way that it will no longer comply with the applicable restrictions and conditions of this SSOA, it shall obtain the appropriate approval from IDEM, OAQ under 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-4.1, 326 IAC 2-5.1, 326 IAC 2-6.1, 326 IAC 2-7, and 326 IAC 2-8.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]**

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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 permitted 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.10 Permit Revocation [326 IAC 2-1.1-9] [326 IAC 2-9-1(j)]**

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

- (1) Violation of any conditions of this permit.
- (2) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (3) Changes in regulatory requirements that mandate either a temporary or

permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

- (4) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
  - (5) For any cause which establishes in the judgment of IDEM the fact that continuance of this permit is not consistent with purposes of this article.
- (b) Pursuant to 326 IAC 2-9-1(j), noncompliance with any applicable provision 326 IAC 2-9 or any requirement contained in this SSOA may result in the revocation of this SSOA and make this source subject to the applicable requirements of a major source.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-9]

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

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

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

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

The 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).

### Compliance Requirements [326 IAC 2-1.1-11] [326 IAC 2-9]

#### C.3 Compliance with Applicable Requirements [326 IAC 2-9-1(i)]

Pursuant to 326 IAC 2-9-1(i), the owner or operator is hereby notified that this operating agreement does not relieve the Permittee of the responsibility to comply with the provisions of any applicable federal, state, or local rules, or any New Source Performance Standards (NSPS), 40 CFR Part 60, or National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 or 40 CFR Part 63.

### Record Keeping and Reporting Requirements [326 IAC 2-9]

#### C.4 General Record Keeping Requirements [326 IAC 2-9-1(f)]

Pursuant to 326 IAC 2-9-1(f), records of all required monitoring data, reports and support information required by this SSOA shall be physically present or electronically accessible at the source location for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

#### C.5 Reporting Requirements [326 IAC 2-9-1(h)]

Pursuant to 326 IAC 2-9-1(h), any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within one (1) week of its occurrence. Said report shall include information on the actions taken to correct the exceedance, including measures to reduce emissions, in order to comply with the established limits. If an exceedance is the result of a malfunction, then the provisions of 326 IAC 1-6 apply.

## SECTION D

## OPERATION CONDITIONS

Operation Description: Surface Coating or Graphic Arts Operation [326 IAC 2-9-3]

(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 2-9]

#### D.1 Volatile Organic Compounds and Hazardous Air Pollutants Limit [326 IAC 2-9-3(2)(A)]

Pursuant to 326 IAC 2-9-3(2)(A), the total amount of volatile organic compounds (VOC) and hazardous air pollutants (HAP) delivered to the surface coating or graphic arts operation at the source shall not exceed fifteen (15) pounds per day.

#### D.2 Particulate [326 IAC 2-9-3(4)]

Pursuant to 326 IAC 2-9-3(4), particulate matter emissions from spray application shall be controlled by a dry filter system or an equivalent control device.

The source shall operate the particulate control device at all times the surface coating or graphic arts operation is in operation in accordance with the manufacturer's specifications.

A source shall be considered in compliance with this requirement provided the overspray is not visibly detectable at the exhaust or accumulated on the rooftops or on the ground.

### Record Keeping and Reporting Requirements [326 IAC 2-9]

#### D.3 Record Keeping Requirements [326 IAC 2-9-3(3)]

Pursuant to 326 IAC 2-9-3(3), the source shall keep the following records of the surface coating (or graphic arts) operation:

- (a) the number of gallons of each solvent containing material used,
- (b) the VOC and HAP content (pounds per gallon as supplied) of each solvent containing material used,
- (c) material safety data sheets (MSDS) developed under 29 CFR 1910.1200(g) or a manufacturer data sheet containing the manufacturer's formulation data for each solvent containing material used.

If a range of VOC or HAP content is provided on either the MSDS or the manufacturer data sheet, the highest content reported shall be used.

If both the MSDS and manufacturer data sheet are available, the manufacturer data sheet shall be the primary source for determining the VOC or HAP content (pounds/gallon) of each solvent containing material,

- (d) a monthly summation of VOC and HAP usage, and
- (e) daily summation of VOC and HAP usage,
- (f) purchase orders and invoices for each solvent containing material used.

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

D.4 Reporting Requirements [326 IAC 2-9-3(5)]

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Pursuant to 326 IAC 2-9-3(5), the Permittee shall include with the annual notice required in Section B - Annual Notification, an inventory listing of the monthly volatile organic compound (VOC) totals, highest daily total per month, and the total VOC emissions for the previous twelve (12) months.

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

**SOURCE SPECIFIC OPERATING AGREEMENT (SSOA)  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-9.

<b>Company Name:</b>	PTI Quality Containment Solution
<b>Address:</b>	700 Patrol Road
<b>City:</b>	Jeffersonville, Indiana 47130
<b>Phone #:</b>	313-365-3999
<b>SSOA #:</b>	S019-35874-00148

I hereby certify that PTI Quality Containment Solution is:

still in operation.

I hereby certify that PTI Quality Containment Solution is:

no longer in operation.

in compliance with the requirements  
of SSOA S019-35874-00148.

not in compliance with the requirements  
of SSOA S019-35874-00148.

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

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

<b>Noncompliance:</b>



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

Technical Support Document (TSD) for  
Source Specific Operating Agreement (SSOA)

**Source Description and Location**

<b>Source Name:</b>	<b>PTI Quality Containment Solution</b>
<b>Source Location:</b>	<b>700 Patrol Road, Jeffersonville, Indiana 47130</b>
<b>County:</b>	<b>Clark (Utica Township)</b>
<b>SIC Code:</b>	<b>5013 (Motor Vehicles and Motor Vehicle Parts and Supplies)</b>
<b>Operation Permit No.:</b>	<b>S019-35874-00148</b>
<b>Permit Reviewer:</b>	<b>Charles Sullivan</b>

The Office of Air Quality (OAQ) has reviewed an application, submitted by PTI Quality Containment Solution on May 28, 2015, for a Source Specific Operating Agreement (SSOA) for construction and operation of a stationary surface coating operation.

**Existing Approvals**

There have been no previous approvals issued to this source.

**Permit Level Determination – SSOA**

This source is obtaining a Source Specific Operating Agreement (SSOA) for approval to construct and operate (pursuant to 326 IAC 2-9). This source consists of the following operations:

- (a) Surface coating or graphic arts operation complying with 326 IAC 2-9-3(2)(A).

The source consists of the following emissions units with combined potentials to emit below Exemption thresholds:

- (b) Parts Washing Operations;
- (c) Solvent Cleaning Operations; and
- (d) Natural gas-fired combustion units consisting of the following:
  - (1) Three (3) Process Heater Washer Tanks, identified as WH-1 through WH-3, each with a heat input capacity of 1.35 MMBtu/hr;
  - (2) One (1) Process Heater Washer Tank, identified as WH-4, with a heat input capacity of 5.30 MMBtu/hr;
  - (3) One (1) Process Heater Washer Tank, identified as Wh-5, with a heat input capacity of 2.00 MMBtu/hr;
  - (4) One (1) Axle Pre-Heat Oven, identified as APO-1, with a heat input capacity of 3.00 MMBtu/hr;
  - (5) One (1) Axle Cure Oven, identified as APO-2, with a heat input capacity of 3.50 MMBtu/hr;
  - (6) One (1) Drive Shaft Pre-Heat Oven, identified as DSO-1, with a heat input capacity of 2.50 MMBtu/hr; and
  - (7) One (1) Drive Shaft Cure Oven, identified as DSO-2, with a heat input capacity of 2.50 MMBtu/hr.

For a source that operates under 326 IAC 2-9 (Source Specific Operating Agreement Program), the source is required to comply with the pre-established emission limitations and standards contained in the specific SSOA(s) under 326 IAC 2-9. For a detailed description of the requirements specific to each SSOA, see 326 IAC 2-9.

#### **Enforcement Issues**

There are no pending enforcement actions related to this source.

#### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

#### **Federal Rule Applicability Determination**

##### New Source Performance Standards (NSPSs)

- (a) The requirements of the New Source Performance Standard (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db, (40 CFR Part 60.40b - 60.49b) (326 IAC 12), are not included in the SSOA, because the heat input capacity of each steam generating unit constructed after June 19, 1984 at this source has a heat input capacity of less than one hundred (100) million British thermal units per hour (MMBtu/hr).
- (b) The requirements of the New Source Performance Standard (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not applicable to the five (5) process heater washer tanks, identified as emission units WH-1 through WH-5, because each unit has a maximum design heat input capacity of less than 10 MMBtu/hr.
- (c) The requirements of the New Source Performance Standard (NSPS) for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60.390, Subpart MM (326 IAC 12), are not included in the SSOA, since the source does not operate an automobile or light-duty truck assembly plant. This source only performs surface coating of axles and D-shafts.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the SSOA.

##### National Emission Standards for Hazardous Air Pollutants (NESHAPs)

- (e) The requirements of the NESHAP for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (63.460 through 63.470) (326 IAC 20-6), are not included in the SSOA, since this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (f) The requirements of the NESHAP for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII, are not included in the SSOA, because the source does not apply topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks and is not a major source, or is not part of a major source of emissions of HAPs. This source only performs surface coating of axles and D-shafts.
- (g) The requirements for the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM (63.3880 through 63.3981) (326 IAC 20-80) are not included in the SSOA because the source is not a major source of HAP emissions.

- (h) The requirements for the NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP (326 IAC 20-81) are not included in the SSOA because the source is not a major source of HAP emissions.
- (i) The requirements of the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD (63.7480 through 63.7575) (326 IAC 20-95), are not included in the SSOA because this source is not a major source of HAPs.
- (j) The requirements of the NESHAP for Painting Stripping and Miscellaneous Metal Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH are not included in the SSOA since the source does not perform paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, or spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium, collectively referred to as the target HAP as defined in 40 CFR 63.11180. This source only performs surface coating of axles and D-shafts, which do not meet the definition of *motor vehicle* or *mobile equipment*, as defined in 40 CFR 11180. Therefore, the requirements of 40 CFR Part 63, Subpart HHHHHH do not apply.
- (k) The requirements of the NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the SSOA, since each the natural gas-fired process heaters (WH-1 thru WH-5) is considered a hot water heater, as defined by 40 CFR 63.11237, which is specifically exempted from this rule under 40 CFR 63.11195(f).
- (l) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the SSOA.

Compliance Assurance Monitoring (CAM)

- (m) 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.

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

- (a) 326 IAC 2-9 (Source Specific Operating Agreement Program)  
SSOA applicability is discussed under the Permit Level Determination – SSOA section above.
- (b) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

- (c) 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.
- (d) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The requirements of 326 IAC 6-5 are not included in the SSOA, since each of the SSOAs contained under 326 IAC 2-9 (Source Specific Operating Agreement Program) that limit fugitive emissions include pre-established fugitive dust control measures.
- (e) 326 IAC 6.5 (Particulate Matter Limitations except Lake County)  
The requirements of 326 IAC 6.5 apply to facilities located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne, which have the potential to emit one hundred (100) tons or more, or actual emissions of ten (10) tons or more of particulate matter per year. The source does not have potential particulate matter emissions greater than one hundred (100) tons per year or actual emissions of greater than ten (10) tons or more per year. Therefore, the source is not subject to the requirements of 326 IAC 6.5.
- (f) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the VOC potential emissions from each emission unit are less than twenty-five (25) tons per year. The source will comply with the requirements 326 IAC 2-9-3, which limits VOC emissions to less than fifteen (15) pounds per day and renders the requirements of 326 IAC 8-1-6 not applicable

#### Surface Coating Operation

- (g) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(d), the surface coating operation shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the control device shall be operated in accordance with manufacturer's specifications.
- (h) 326 IAC 8-2 (Surface Coating Emission Limitations)  
The source would have been subject to the requirements of 326 IAC 8-2 when performing miscellaneous metal coating operations (not covered under 326 IAC 8-10), however the source will comply with the requirements 326 IAC 2-9-3, which limits VOC emissions to less than fifteen (15) pounds per day and renders the requirements of 326 IAC 8-2 not applicable.

#### Natural Gas-Fired Combustion

- (i) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
Pursuant to 326 IAC 6-2-1(d), the five (5) natural gas-fired process heater washer tanks (WH-1 thru WH-5) are all subject to 326 IAC 6-2-4 because they are indirect heating units that were constructed after September 21, 1983. Pursuant to 326 IAC 6-2-1(d), the five (5) natural gas-fired process heaters shall be limited as follows:

When  $Q < 10$  MMBtu per hour, Pt shall not exceed 0.6

$$\text{When } 10 < Q \leq 10,000 \text{ MMBtu per hour, } Pt = \frac{1.09}{Q^{0.26}}$$

Where Q = Total source maximum operating capacity in MMBtu/hr heat input and,  
Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Emission Unit/ID	Construction Date	Q (MMBtu/hr)	Pt (lb/MMBtu)
WH-1 thru WH-5	2015	1.35 + 1.35 + 1.35 + 5.3 + 2.0 = 11.35	0.58

The potential to emit PM from each boiler was calculated as follows:

$$1.9 \text{ lb/MMCF} \times 1 \text{ MMCF} / 1,020 \text{ MMBtu} = 0.0019 \text{ lb/MMBtu}$$

Therefore, the natural gas-fired process heaters are capable of complying with this limit without the use of a control device.

- (j) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
 Each of the natural gas-fired units at this source 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. In addition, pursuant to 326 IAC 6-3-1(b)(14), each of the natural gas-fired units at this source is also exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions of less than five hundred fifty one thousandths (0.551) pound per hour.
- (k) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
 The natural gas-fired units are not subject to 326 IAC 7-1.1, since they each have potential sulfur dioxide emissions of less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

Parts Washing Operation

- (l) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-1(b)(14), the parts washer operation is exempt from the requirements of 326 IAC 6-3, since the potential particulate emissions are less than five hundred fifty-one (0.551) pound per hour.
- (m) 326 IAC 8-3 (Organic Solvent Degreasing Operations)  
 The parts washing operation at this source is not subject to the requirements of 326 IAC 8-3, since the degreaser uses a non-VOC containing solvent.

**Compliance Determination, Monitoring, Record Keeping, and Reporting Requirements**

For a source that operates under 326 IAC 2-9 (Source Specific Operating Agreement Program), the source is required to comply with the pre-established emission limitations and standards, compliance determination, compliance monitoring, and record keeping and reporting requirements contained in the specific SSOA(s) under 326 IAC 2-9. For a detailed description of the requirements specific to each SSOA, see 326 IAC 2-9.

**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 May 28, 2015.

The construction and operation of this source shall be subject to the conditions of the attached proposed SSOA No. S019-35874-00148. The staff recommends to the Commissioner that this SSOA be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Charles Sullivan at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emissions Calculations  
Emission Summary**

**Company Name:** PTI Quality Containment Solution  
**Source Address:** 700 Patrol Road, Jeffersonville, IN 47130  
**Permit Number:** S019-35874-00148  
**Reviewer:** Charles Sullivan  
**Date:** 3-Jun-15

Pollutant	Unlimited/Uncontrolled PTE of Exempt Operations (tons/year)				Limited/Controlled PTE of Surface Coating Operation (tons/year)*	Limited PTE of Entire Source (tons/year)
	Parts Washing	Cleaning Solvents	Natural Gas Heaters	Total		
PM	0.05	--	0.19	0.24	negl.**	<b>0.24</b>
PM10	0.05	--	0.75	0.80	negl.**	<b>0.80</b>
PM2.5	0.05	--	0.75	0.80	negl.**	<b>0.80</b>
NOx	--	--	9.81	9.81	--	<b>9.81</b>
CO	--	--	8.24	8.24	--	<b>8.24</b>
VOC	--	0.56	0.54	1.10	2.74	<b>3.83</b>
SO2	--	--	0.06	0.06	--	<b>0.06</b>
Total HAPs	0.07		0.19	0.25	2.74	<b>2.99</b>

**Notes:**

negl. = negligible

\*Pursuant to 326 IAC 2-9-3(2)(A), the total amount of volatile organic compounds (VOC) and hazardous air pollutants (HAP) delivered to the surface coating or graphic arts operation at the source shall not exceed fifteen (15) pounds per day.

\*\*Limited/controlled particulate emissions from the surface coating operation are assumed to be negligible, since the source will limit coating material usage to comply with the SSOA VOC and HAP limits (pursuant to 326 IAC 2-9-3(2)(A)) and particulate matter emissions from spray application shall be controlled by a dry filter system or an equivalent control device (pursuant to 326 IAC 2-9-3(4)).

**Appendix A: Emissions Calculations  
Parts Washer**

**Company Name: PTI Quality Containment Solution  
Source Address: 700 Patrol Road, Jeffersonville, IN 47130  
Permit Number: S019-35874-00148  
Reviewer: Charles Sullivan  
Date: 3-Jun-15**

Product	Actual Usage (gal/day) <sup>1</sup>	Potential Usage (gal/yr)	Density (lb/gal)	wt% VOC	wt% HAPs				VOC Emissions (ton/yr)	Particulate Emissions <sup>2</sup> (PM/PM10/PM2.5)	Potential HAP Emissions (tons/yr)				
					wt% Mn Compounds	wt% Ni compounds	wt% HF	wt% Zn Compounds			Mn Compounds	Ni Compounds	HF	Zn Compounds	Total HAPs
<b>Axle Line</b>															
Bonderite C-AK 470	2.82	1543.95	10.85	0%					0.00	0.00	0.00	0.00	0.00	0.00	0.00
Prepalene X	0.2	109.50	9.68	0%				20%	0.00	0.00	0.00	0.00	0.00	0.02	0.02
Bonderite 952 Repl	2.94	1609.65	10.72	0%	7.50%	2.50%	0.50%	21%	0.00	0.03	6.28E-03	2.09E-03	4.19E-04	0.02	0.03
Bonderite M-PT 54 NC	0.1	54.75	8.95	0%					0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Drive Shaft</b>															
Bonderite C-AK 319	6.55	3586.13	10.43	0%					0.00	0.00	0.00	0.00	0.00	0.00	0.00
Prepalene X	0.4	219.00	9.68	0%					0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bonderite 952 Repl	6.82	3733.95	10.72	0%	7.50%	2.50%	0.50%	21%	0.00	0.03	6.28E-03	2.09E-03	4.19E-04	0.02	0.03
Bonderite M-PT 54 NC	0.22	120.45	8.95	0%					0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>									<b>0.00</b>	<b>0.05</b>	<b>0.01</b>	<b>4.19E-03</b>	<b>8.38E-04</b>	<b>0.05</b>	<b>0.07</b>

Note: 1- Actual usage is from a similar PTI facility located in Detroit, Michigan, determined by scaling up the actual usage to 8,760 hrs per year of operation  
2- HAP emissions are emitted when the part is blown off after it is cleaned. It is assumed that 1% of the washing material is emitted when the unit is blown off. The solid compounds (Mn, Ni and Zn) blown off HAP emissions are also considered particulate emissions.

**Methodology**

VOC Emissions (tons/yr) = Potential Usage (gal/yr) x Density (lb/gal) x wt% VOC x 1 ton/2,000 lbs  
HAP Emissions (tons/yr) = Potential Usage (gal/yr) x Density (lb/gal) x wt% HAP x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations  
Cleaning Solvents**

**Company Name: PTI Quality Containment Solution  
Source Address: 700 Patrol Road, Jeffersonville, IN 47130  
Permit Number: S019-35874-00148  
Reviewer: Charles Sullivan  
Date: 3-Jun-15**

**Cleaning Solvents**

	Density, lbs/gal	VOC (lbs/gal)	Weight % Solids	Parts per hour	Usage (gal/part)	VOC PTE			PM/PM10/PM2.5 Uncontrolled PTE		
						lbs/hour	lbs/day	tons/year	lbs/hour	lbs/day	tons/year
<b>Axles</b>											
MEK	6.72	6.72	0%	93	5.00E-05	0.03	0.7	0.14	0.0	0.0	0.00
WD-40	6.76	3.35	25%	93	5.00E-05	0.02	0.4	0.07	0.0	0.0	0.00
<b>D shafts</b>											
MEK	6.72	6.72	0%	160	5.00E-05	0.05	1.3	0.24	0.0	0.0	0.00
WD-40	6.76	3.35	25%	160	5.00E-05	0.03	0.6	0.12	0.0	0.0	0.00
<b>Totals:</b>						<b>0.13</b>	<b>3.06</b>	<b>0.56</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Transfer efficiency      100%  
PM Control Efficiency      0%  
No HAPs

**Methodology**

VOC Emissions (lbs/hr) = VOC Content (lb/gal) x Parts per hour x Usage (gallons/part)  
PM/PM10/PM2.5 Emissions (lbs/hr) = Parts per Hour x Usage (gal/part) x Density (lb/gal) x wt% Solids x (1 - Transfer Efficiency)  
Emissions (lb/day) = Emissions (lbs/hr) x 24 hrs/day  
Emissions (ton/yr) = Emissions (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

Note: MEK and WD-40 are wiped and/or brushed onto the parts to clean the parts after they have been washed.

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

**Company Name:** PTI Quality Containment Solution  
**Source Address:** 700 Patrol Road, Jeffersonville, IN 47130  
**Permit Number:** S019-35874-00148  
**Reviewer:** Charles Sullivan  
**Date:** 3-Jun-15

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
22.85	1020	196.2

Unit Type	Unit ID	MMBtu/hr
Process Heater		
Washer Tank (3)	WH-1 thru 3	4.05
Washer Tank (1)	WH-4	5.30
Washer Tank (1)	WH-5	2.00
Axle Pre-Heat Oven	APO-1	3.00
Axle Cure Oven	APO-2	3.50
Drive Shaft Pre-Heat Oven	DSO-1	2.50
Drive Shaft Cure Oven	DSO-2	2.50
<b>Total</b>		<b>22.85</b>

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.19	0.75	0.75	0.06	9.81	0.54	8.24

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

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.1E-04	1.2E-04	7.4E-03	1.8E-01	3.3E-04	<b>0.18</b>

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.9E-05	1.1E-04	1.4E-04	3.7E-05	2.1E-04	<b>5.4E-04</b>
					<b>Total HAPs</b>	<b>0.19</b>
					<b>Worst HAP</b>	<b>0.18</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Hexane



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

TO: Mazen Kaloti  
PTI Quality Containment Solution  
700 Patrol Rd  
Jeffersonville, IN 47130

DATE: July 8, 2015

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

SUBJECT: Final Decision  
SSOA  
019-35874-00148

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Holly ARgis (ERM)  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

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2		Jafar Iqbal Owner PTI Quality Containment Solution 700 Patrol Rd Jeffersonville IN 47130 (RO CAATS)									
3		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)									
4		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)									
5		Jeffersonville City Council and Mayors Office 500 Quarter Master Jeffersonville IN 47130 (Local Official)									
6		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)									
7		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)									
8		Holly Argiris Environmental Resources Management (ERM) 8425 Woodfield Crossing Blvd, Suite 560-W Indianapolis IN 46240 (Consultant)									
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