



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding The Transitioning of SSOA to a
Minor Source Operating Permit (MSOP)

for PTI Quality Containment Solution in Clark County

SSOA transitioning to MSOP No.: M019-36197-00148

The Indiana Department of Environmental Management (IDEM) has received an application from PTI Quality Containment Solution, located at 700 Patrol Road, Jeffersonville, Indiana 47130, for a transitioning to a Minor Source Operating Permit (MSOP) of its Source Specific Operating Agreement (SSOA) issued on July 8, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed transitioning to MSOP would allow PTI Quality Containment Solution to make certain changes at its existing source. PTI Quality Containment Solution has applied to construct a 5.0 MMBtu per hour air make-up unit and the revision of the emission calculation of the surface coating booths based on the transfer efficiency of 75%.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Jeffersonville Township Public Library
211 E. Court Avenue
Jeffersonville, IN 47130

and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

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

How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing,

you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M019-36197-00148 in all correspondence.

Comments should be sent to:

Josiah Balogun
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5257
Or dial directly: (317) 234-5257
Fax: (317) 232-6749 attn: Josiah Balogun
E-mail: jalogun@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Josiah Balogun of my staff at the above address.



Tripurari P. Sinha, Ph.D., Section Chief
Permits Branch
Office of Air Quality



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DRAFT

Minor Source Operating Permit 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 permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 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 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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M019-36197-00148	
Issued by:	Issuance Date:
Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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
County Location:	Clark
Source Location Status:	Nonattainment for PM _{2.5} standard Attainment for all other criteria pollutants
Source Status:	Minor Source 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

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

- (a) One (1) Axle surface coating booth, identified as AB-1, constructed in 2015, with a maximum capacity of 120 parts per hour, equipped with dry filters for particulate control, and exhausting to stack AB-1.
- (b) One (1) Drive Shaft coating booth, identified as DB-1, constructed in 2015, with a maximum capacity of 120 parts per hour, equipped with dry filters for particulate control, and exhausting to stack DS-1.
- (c) Three (3) Washer Tanks, identified as WH-1, WH-2, and WH-3, all constructed in 2015, each with a heat input capacity of 1.35 MMBtu/hr.
- (d) One (1) Process Heater Washer Tank, identified as WH-4, constructed in 2015, with a heat input capacity of 5.30 MMBtu/hr.
- (e) One (1) Process Heater Wash Tank, identified as WH-5, constructed in 2015, with a heat input capacity of 2.00 MMBtu/hr.
- (f) One (1) Axle Pre-Heat Oven, identified as APO-1, with a heat input capacity of 3.0 MMBtu/hr, constructed in 2015.
- (g) One (1) Axle Cure Oven, identified as APO-2, with a heat input capacity of 3.5 MMBtu/hr, constructed in 2015.
- (h) One (1) Drive Shaft Pre-Heat Oven, identified as DSO-1, with a heat input capacity of 2.5 MMBtu/hr, constructed in 2015.

- (i) One (1) Drive Shaft Cure Oven, identified as DSO-2, with a heat input capacity of 2.5 MMBtu/hr, constructed in 2015.
- (j) One (1) Axle Parts Washer Line with a capacity of 6.1 gallons per day of non-volatile chemicals, constructed in 2015.
- (k) One (1) Drive Shaft Parts Washer, identified as PW-2, with a capacity of 14.0 gallons per day of non-volatile chemicals, constructed in 2015.
- (l) One (1) Air Make-Up Unit, identified as AMU-1, approved in 2016 for construction, with a maximum capacity of 5.0 MMBtu/hr.

SECTION B GENERAL CONDITIONS

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

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M019-36197-00148, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.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

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

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

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

B.7 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (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 permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 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.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

The Permittee shall implement the PMPs.

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M019-36197-00148 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.18 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) 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.

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 Stack Height [326 IAC 1-7]

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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 2-6.1-5(a)(2)]

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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. 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 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of 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

- (b) 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.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Axle surface coating booth, identified as AB-1, constructed in 2015, with a maximum capacity of 120 parts per hour, equipped with dry filters for particulate control, and exhausting to stack AB-1.
- (b) One (1) Drive Shaft coating booth, identified as DB-1, constructed in 2015, with a maximum capacity of 120 parts per hour, equipped with dry filters for particulate control, and exhausting to stack DS-1.

(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 2-6.1-5(a)(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, less water, as delivered to the applicator of the axle surface coating line, identified as AB-1.

D.1.2 Volatile Organic Compounds (VOC) Limitations, 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 be limited to, the following:

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

D.1.3 Particulate Emission Limitations for Work Practices and Control Technologies [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) from the surface coating booths, identified as AB-1 and DB-1 shall be controlled by dry filters, and the Permittee shall operate the filters in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP) is required for this unit and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

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

- (a) Compliance with the VOC limitation contained in Condition D.1.1 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.

For Non - Compliant Coating

- (b) Compliance with the VOC content limit in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

Where:

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

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

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.7 Monitoring [326 IAC 2-6.1-5(a)(2)]

- (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 two (2) surface coating booths while one or both of the booths are in operation. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Response to Excursions or Exceedances, 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 rooftops and the nearby ground. The Response to Excursions or Exceedances for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.8 Record Keeping Requirements [326 IAC 2-6.1-5(a)(2)]

- (a) To document the compliance status with Condition D.1.1 - Volatile Organic Compounds (VOC) , the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content and usage limits, and the VOC emission limits established in Condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water;

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and VOC content;
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and
- (2) The volume weighted VOC content less water of the non-compliant coatings used for each day.
- The volume weighted VOC content does not have to be calculated or recorded on those days when only compliant coatings are used.
- (3) The cleanup solvent usage for each month; and
 - (4) The total VOC usage for each month;
- (b) To document the compliance status with Condition D.1.6 - Monitoring, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspection.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) Three (3) Washer Tanks, identified as WH-1, WH-2, and WH-3, all constructed in 2015, each with a heat input capacity of 1.35 MMBtu/hr.
- (d) One (1) Process Heater Washer Tank, identified as WH-4, constructed in 2015, with a heat input capacity of 5.30 MMBtu/hr.
- (e) One (1) Process Heater Wash Tank, identified as WH-5, constructed in 2015, with a heat input capacity of 2.00 MMBtu/hr.
- (f) One (1) Axle Pre-Heat Oven, identified as APO-1, with a heat input capacity of 3.0 MMBtu/hr, constructed in 2015.
- (g) One (1) Axle Cure Oven, identified as APO-2, with a heat input capacity of 3.5 MMBtu/hr, constructed in 2015.
- (h) One (1) Drive Shaft Pre-Heat Oven, identified as DSO-1, with a heat input capacity of 2.5 MMBtu/hr, constructed in 2015.
- (i) One (1) Drive Shaft Cure Oven, identified as DSO-2, with a heat input capacity of 2.5 MMBtu/hr, constructed in 2015.
- (j) One (1) Axle Parts Washer Line with a capacity of 6.1 gallons per day of non-volatile chemicals, constructed in 2015.
- (k) One (1) Drive Shaft Parts Washer, identified as PW-2, with a capacity of 14.0 gallons per day of non-volatile chemicals, constructed in 2015.
- (l) One (1) Air Make-Up Unit, identified as AMU-1, approved in 2016 for construction, with a maximum capacity of 5.0 MMBtu/hr.

(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 2-6.1-5(a)(1)]

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter (PM) emissions from the natural gas combustion units shall not exceed 0.46 pounds of PM per million British thermal units.

The limit is calculated using the equation below:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and

Q = Total source maximum operating capacity (27.55 MMBtu/hr)

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	PTI Quality Containment Solution
Address:	700 Patrol Road
City:	Jeffersonville, Indiana 47130
Phone #:	(313) 365 3999
MSOP #:	M019-36197-00148

I hereby certify that PTI Quality Containment Solution is : still in operation.
 no longer in operation.

I hereby certify that PTI Quality Containment Solution is : in compliance with the requirements of MSOP M019-36197-00148.
 not in compliance with the requirements of MSOP M019-36197-00148.

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

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

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a SSOA Transitioning to a Minor
Source Operating Permit (MSOP)

Source Description and Location

Source Name: PTI Quality Containment Solution
Source Location: 700 Patrol Road, Jeffersonville, Indiana 47130
County: Clark
SIC Code: 5013
Operation Permit No.: 019-36197-00148
Permit Reviewer: Josiah Balogun

On August 27, 2015, the Office of Air Quality (OAQ) received an application from PTI Quality Containment Solution related to the construction and operation of new emission unit at an existing plant and transition from a Source Specific Operating Agreement (SSOA) to a Minor Source Operating Permit (MSOP).

Existing Approvals

The source has been operating under SSOA No. 019-35874-00148, issued on July 8, 2015.

Due to this application, the source is transitioning from a Source Specific Operating Agreement (SSOA) to a MSOP.

County Attainment Status

The source is located in Clark County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .
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.

¹Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard 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. Clark 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}**
Clark County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) **Other Criteria Pollutants**
Clark County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, CO, NO₂ and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of regulated pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by PTI Quality Containment on August 27, 2015, relating to construction and operation of a 5.0 MMBtu per hour air make-up unit and the revision of the emission calculation of the surface coating booths based on the transfer efficiency of 75%.

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

- (a) One (1) Axle surface coating booth, identified as AB-1, constructed in 2015, with a maximum capacity of 120 parts per hour, equipped with dry filters for particulate control, and exhausting to stack AB-1.
- (b) One (1) Drive Shaft coating booth, identified as DB-1, constructed in 2015, with a maximum capacity of 120 parts per hour, equipped with dry filters for particulate control, and exhausting to stack DS-1.
- (c) Three (3) Washer Tanks, identified as WH-1, WH-2, and WH-3, all constructed in 2015, each with a heat input capacity of 1.35 MMBtu/hr.
- (d) One (1) Process Heater Washer Tank, identified as WH-4, constructed in 2015, with a heat input capacity of 5.30 MMBtu/hr.
- (e) One (1) Process Heater Wash Tank, identified as WH-5, constructed in 2015, with a heat input capacity of 2.00 MMBtu/hr.
- (f) One (1) Axle Pre-Heat Oven, identified as APO-1, with a heat input capacity of 3.0 MMBtu/hr, constructed in 2015.
- (g) One (1) Axle Cure Oven, identified as APO-2, with a heat input capacity of 3.5 MMBtu/hr, constructed in 2015.

- (h) One (1) Drive Shaft Pre-Heat Oven, identified as DSO-1, with a heat input capacity of 2.5 MMBtu/hr, constructed in 2015.
- (i) One (1) Drive Shaft Cure Oven, identified as DSO-2, with a heat input capacity of 2.5 MMBtu/hr, constructed in 2015.
- (j) One (1) Axle Parts Washer Line with a capacity of 6.1 gallons per day of non-volatile chemicals, constructed in 2015.
- (k) One (1) Drive Shaft Parts Washer, identified as PW-2, with a capacity of 14.0 gallons per day of non-volatile chemicals, constructed in 2015.

The following is a description of the new emission unit:

- (a) One (1) Air Make-Up Unit, identified as AMU-1, approved in 2016 for construction, with a maximum capacity of 5.0 MMBtu/hr.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP
--

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

Pollutant	Uncontrolled/Unlimited (tons/year)
PM	96.08
PM10 ⁽¹⁾	96.76
PM2.5	96.76
SO ₂	0.07
NO _x	11.96
VOC	6.78
CO	10.05

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Benzene	0.0003
Formaldehyde	0.0090
Hexane	0.22
Mn Compounds	0.013
Ni Compounds	0.0042
HF	0.00084

Zn Compounds	0.051
TOTAL HAPs	0.29

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM10 and PM2.5 are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating and Solvents	95.78	95.78	95.78	0	0	6.12	0	0	0
Natural Gas heaters	0.23	0.91	0.91	0.07	11.96	0.66	10.05	0.23	0.22 (Hexane)
Part Washing	0.069	0.069	0.069	0	0	0	0	0.069	0.05 (Zn)
Total PTE of Entire Source	96.08	96.76	96.76	0.07	11.96	6.78	10.05	0.29	0.22 (Hexane)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	--	250	250	250	250	NA	NA
Nonattainment NSR Major Source Thresholds	--	--	100	100	100	--	--	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".									

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) 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.

- (b) 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 for the axle surface coating and the drive shaft coating booths, 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.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) 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 for the part washing operation, since this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (e) The requirements of the NESHAP for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII, are not included for the surface coating and the drive shaft coating booths, 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.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) are not included in this permit for the surface coating operations. The source applies surface coating to metal parts and products and has the potential to emit greater than 10 tons per year of a single HAP. The surface coating operations are not subject to 40 CFR 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products because the source is not a major source of HAPs, as defined in 40 CFR 63, Subpart A.
- (g) 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 for the surface coating and the drive shaft coating booths because the source is not a major source of HAP emissions.
- (h) The requirements of the NESHAP for Painting Stripping and Miscellaneous Metal Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH are not included for the surface coating and the drive shaft coating booths 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.
- (i) The requirements of the NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included for the natural gas-fired process heaters (WH-1 thru WH-5), since each of 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 pursuant to 40 CFR 63.11195(f).
- (j) 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 MSOP.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:
- (1) The potential to emit PM is less than 250 tons per year,
 - (2) The potential to emit all other PSD regulated pollutants are less than 250 tons per year,
 - (3) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (c) 326 IAC 2-3 (Emission Offset)
This existing source is not a major stationary source, under 326 IAC 2-3 (Emission Offset), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM_{2.5}), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year from each emission unit. Therefore, none of the emission units are subject to the provisions of 326 IAC 2-4.1.
- (e) 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.
- (f) 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.
- (g) 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.

- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
 The source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions less than 25 tons per year.
- (i) 326 IAC 6.5 PM Limitations Except Lake County
 This source is not subject to 326 IAC 6.5 because, eventhough it is located in Clark County, its PM PTE (or limited PM PTE) is less than 100 tons/year and actual emissions are less than 10 tons per year.
- (j) 326 IAC 12 (New Source Performance Standards)
 See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Polluants)
 See Federal Rule Applicability Section of this TSD.
- (l) 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
 The natural gas combustion units are subject to 326 IAC 6-2-4, because the emission units were constructed in 2015. Pursuant to this rule, the particulate matter emissions from the boiler shall not exceed 0.46 lb/MMBtu.

Year	Unit	Q (MMBtu/hr)	Pt (lb/MMBtu)	Emission Limit (lb/MMBtu)
2015	NG	4.05+5.3+2+3+3.5+2.5+2.5+5 = 27.85	0.46	0.46

$$Pt = \frac{1.09}{Q^{0.26}}$$

$$= \frac{1.09}{27.55^{0.26}} = 0.46 \text{ lb/MMBtu}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and

Q = Total source maximum operating capacity (27.55 MMBtu/hr)

- (m) 326 IAC 6-3-2(d) (Particulate Emission Limitations for Work Practices and Control Technologies)
 Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) from the two (2) surface coating booths, identified as AB-1 & DB-1 shall be controlled by dry filter and the Permittee shall operate the filters in accordance with manufacturer's specifications.
- (n) 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
 The natural gas emission units are not subject to 326 IAC 326 IAC 7-1.1 because its SO₂ PTE (or limited SO₂ PTE) is less than 25 tons per year or 10 pounds per hour.
- (o) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 This rule requires that new facilities (as of January 1, 1980), which have potential VOC emissions of 25 tons or more per year, located anywhere in the state, shall be subject to the requirements of this rule. The two (2) surface coating booths, identified as AB-1 & DB-1, each, has VOC emission less than 25 tons per year. Therefore, the surface coating booths are not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) at this source.

- (p) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
 Pursuant to 326 IAC 8-2-1(a)(4), the axle surface coating booth, identified as AB-1 is subject to 326 IAC 8-2-9 because it was constructed after July 1, 1990, its actual before control emissions are greater than fifteen (15) pounds per day.

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, less water, as delivered to the applicator of the axle surface coating line, identified as AB-1.

For Non-compliant Coating:

The daily volume weighted average of VOC content shall be calculated using the following methodology:

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

Where:

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

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.

- (q) There are no other 326 IAC 8 Rules that are applicable to the facility.

Compliance Determination, Monitoring and Testing Requirements
--

- (a) The compliance monitoring requirements applicable to the two (2) Surface coating booths (AB-1 & DB-1) are as follows:

Emission Units	Frequency	Parameters
Surface coating booth (AB-1 & DB-1)	Daily	Inspections shall be performed to verify placement, integrity and particle loading of the dry filters.
Surface coating booth (AB-1 & DB-1)	Weekly	Observations of the overspray from the surface coating booth stacks, while one or more booths are in operation.
Surface coating booth (AB-1 & DB-1)	Monthly	Observations of the coating emission from the stacks, and presence of overspray on rooftops and nearby ground.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 27, 2015.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 019-36197-00148. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Josiah Balogun 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) 234-5257 or toll free at 1-800-451-6027 extension 4-5257.
- (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
Emission Summary**

Source Name: PTI Quality Containment Solution
Source Location: 700 Patrol Road, Jeffersonville, IN, 47130
Permit Number: M019-36197-00148
Permit Reviewer: Josiah Balogun
Date: 19-Jan-2016

Uncontrolled Potential to Emit

	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHGs as CO₂e (tons/yr)	HAPs (tons/yr)
Emission Unit									
Surface Coating and Solvent	95.78	95.78	95.78	0	0	6.12	0	0	0
Natural Gas Heaters	0.23	0.91	0.91	0.07	11.96	0.66	10.05	14,438	0.23
Part Washing	0.069	0.069	0.069	0	0	0	0	0	0.069
Total Emissions	96.08	96.76	96.76	0.07	11.96	6.78	10.05	14438.28	0.29

**PTI Quality Containment Solution
Surface Coating Emission Calculations**

Coating and Solvent use PTE Calcs

	Density, lbs/gal	VOC (lbs/gal)	Weight % Solids	Parts per hour	Usage (gal/part)	VOC PTE			PM/PM10/PM2.5 Uncontrolled PTE			Controlled PM PTE
						lbs/hour	lbs/day	tons/year	lbs/hour	lbs/day	tons/year	tons/year
Axles												
TechKote WA 2951 F (FE) Water Based Black Protective Coating	10.96	0.08	50%	120	0.083	0.80	19.1	3.49	13.6	327.5	59.76	2.99
MEK	6.72	6.72	0%	120	0.00005	0.04	1.0	0.18	0.0	0.0	0.00	0.00
WD-40	6.76	3.35	25%	120	0.00005	0.02	0.5	0.09	0.0	0.1	0.01	0.00
D shafts												
TechKote WA 2951 F (FE) Water Based Black Protective Coating	10.96	0.08	50%	120	0.05	0.48	11.5	2.10	8.2	197.3	36.00	1.80
MEK	6.72	6.72	0%	120	0.00005	0.04	1.0	0.18	0.0	0.0	0.00	0.00
WD-40	6.76	3.35	25%	120	0.00005	0.02	0.5	0.09	0.0	0.1	0.01	0.00
Totals						1.40	33.54	6.12	21.87	524.84	95.78	4.79

Transfer efficiency 75%
PM Control Efficiency 95%
No HAPs

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)

Controlled PM/PM10/PM2.5 Emissions (ton/hr) = Uncontrolled Emissions x (1 - Control 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

**PTI Quality Containment Solution
Natural Gas Combustion Emission Calculations**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
27.85	1020	239.2

Unit Type	Unit ID	MMBtu/hr
process heater		
Washer Tank (3)		4.05
Washer Tank (1)		5.3
Washer Tank (1)		2
Axle Pre-Heat Oven		3
Axle Cure Oven		3.5
Drive Shaft Pre-Heat Oven		2.5
Drive Shaft Cure Oven		2.5
Proposed Air Make-Up Unit		5
Total		27.85

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	0.227	0.909	0.909	0.072	11.96	0.658	10.046

*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/1,000 MMBtu

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

See page 2 for HAPs emissions calculations.

**PTI Quality Containment Solution
Natural Gas Combustion Emission Calculations**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.511E-04	1.435E-04	8.969E-03	2.153E-01	4.066E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.980E-05	1.316E-04	1.674E-04	4.544E-05	2.511E-04

Single HAP **2.153E-01**
Total HAPS **2.257E-01**

Methodology is the same as page 1.

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

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

See Page 3 for Greenhouse Gas calculations.

**PTI Quality Containment Solution
Natural Gas Combustion Emission Calculations**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	14,351	0.275	0.263
Summed Potential Emissions in tons/yr	14,351		
CO2e Total in tons/yr	14,438		

Methodology

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

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

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**PTI Quality Containment Solution
Parts Washer Emission Calculations**

Product	Actual Usage (gal/day)	Potential Usage (gal/yr)	Density (lb/gal)	wt% VOC	wt% HAPs				VOC Emissions (ton/yr)	Potential HAP Emissions (tons/yr)			
					wt% Mn Compounds	wt% Ni compounds	wt% HF	wt% Zn Compounds		Mn Compounds	Ni Compounds	HF	Zn Compounds
Axle Line													
Bonderite C-AK 470	2.82	1543.95	10.85	0%					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	1.68E-02
Bonderite 952 Repl	2.94	1609.65	10.72	0%	7.50%	2.50%	0.50%	21%	0.00	6.28E-03	2.09E-03	4.19E-04	1.72E-02
Bonderite M-PT 54 NC	0.1	54.75	9.00	0%					0.00	0.00	0.00	0.00	0.00
Drive Shaft													
Bonderite C-AK 319	6.55	3586.13	10.43	0%					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
Bonderite 952 Repl	6.82	3733.95	10.72	0.00%	7.50%	2.50%	0.50%	21%	0.00	6.28E-03	2.09E-03	4.19E-04	1.72E-02
Bonderite M-PT 54 NC	0.22	120.45	9.00	0%					0.00	0.00	0.00	0.00	0.00
Total									0.00	1.26E-02	4.19E-03	8.38E-04	5.11E-02

PM/PM10/PM2.5 (ton/yr) = **6.87E-02**

Note: Potential Usage is determined by scaling up actual usage to 8,760 hrs per year of operation

HAPs (ton/yr) = 6.87E-02

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.

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

February 17, 2016
PTI Quality Containment Solution
019-36197-00148

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 8/27/2015



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

February 17, 2016

Mr. Mazen Kaloti
PTI Quality Containment Solution
700 Patrol Road
Jeffersonville, IN 47130

Re: Public Notice
PTI Quality Containment Solution
Permit Level: Minor Source Operating Permit
Permit Number: 019-36197-00148

Dear Mr. Kaloti:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Evening News in Jeffersonville, Indiana publish the abbreviated version of the public notice no later than February 20, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Jeffersonville Township Public Library, 211 E Court Avenue in Jeffersonville, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Josiah Balogun, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5257 or dial (317) 234-5257.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 8/27/2015



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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February 17, 2016

To: Jeffersonville Township Public Library

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

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

Applicant Name: PTI Quality Containment Solution
Permit Number: 019-36197-00148

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

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

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

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

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

Enclosures
PN Library.dot 8/27/2015



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

February 17, 2016

Evening News
221 Spring Street
Jeffersonville, IN 47130

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for PTI Quality Containment Solution, Clark County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than February 20, 2016.

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

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: Minor Source Operating Permit
Permit Number: 019-36197-00148

Enclosure

PN Newspaper.dot 8/27/2015

Mail Code 61-53

IDEM Staff	GHOTOPP 2/17/2016 PTI Quality Containment Solution 019-36197-00148 Draft		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Mazen Kaloti PTI Quality Containment Solution 700 Patrol Rd Jeffersonville IN 47130 (Source CAATS)										
2		Zafar Iqbal Owner PTI Quality Containment Solution 18515 Sherwood St Detroit MI 48234 (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		Jeffersonville Twp Public Library 211 E Court Ave, P.O. Box 1548 Jeffersonville IN 47131-1548 (Library)										
7		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
8		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
9		Holly Argiris Environmental Resources Management (ERM) 8425 Woodfield Crossing Blvd, Suite 560-W Indianapolis IN 46240 (Consultant)										
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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