



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Federally Enforceable Operating Permit (FESOP)
for Aerofab, Division of Tube Processing Corporation in Marion County

FESOP Renewal No.: F097-36238-00011

The Indiana Department of Environmental Management (IDEM) has received an application from Aerofab, Division of Tube Processing Corporation located at 604 East LeGrande Avenue, Indianapolis, IN 46203 for a renewal of its FESOP issued on June 6, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Aerofab, Division of Tube Processing Corporation to continue to operate its existing source.

This draft FESOP Renewal does not contain any new equipment that would emit air pollutants; however, 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). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

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

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

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F097-36238-00011 in all correspondence.

Comments should be sent to:

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

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

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

What will happen after IDEM makes a decision?

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

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



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



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Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

DRAFT

Aerofab, Division of Tube Processing Corporation
604 East LeGrande Avenue
Indianapolis, Indiana 46203

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

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

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

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

Table with 2 columns: Issued by (Jason R. Krawczyk, Section Chief, Permits Branch, Office of Air Quality) and Issuance/Expiration Date.

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Attachment A - NESHAP Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations [40 CFR Part 63, Subpart WWWWWW][326 IAC 20-1]

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary steel tubing fabrication and repair operation.

Source Address:	604 East LeGrande Avenue, Indianapolis, Indiana 46203
General Source Phone Number:	317-782-9628
SIC Code:	3498 (Fabricated Pipe and Pipe Fittings), 3444 (Sheet Metal Work)
County Location:	Marion (Center Township)
Source Location Status:	Nonattainment for SO ₂ standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) enclosed paint booth, constructed in 2002, identified as EU1, used to apply coatings to a limited quantity of small aviation components.

The booth has a maximum capacity to paint approximately 268 aerospace components of various types per month using the coating Sermetel W.

The booth has a maximum capacity to paint approximately 20 aerospace components of various types per month using the coating Alseal 625.

EU1 uses dry filters, DF1, as control equipment, and exhausts to S1.

- (b) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU2, constructed in 1987, with a maximum coating capacity of 23.8 pounds of metal powder per hour; utilizing a Torit Dust Collector, identified as 2101, as particulate control and exhausting through vent S2.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

- (c) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these

thermal spray coating booths are considered affected facilities.

- (d) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (e) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (f) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU15, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

- (g) One (1) cleanup operation utilizing acetone and isopropyl alcohol as solvents and a maximum usage rate of 0.27 gallons per hour.

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

This stationary source also includes the following insignificant activities:

- (a) One (1) toluene pretreatment cleaning operation, constructed in 1987, using a toluene based precleaner called Turco pretreat on titanium parts in order to prevent scale formation during the thermal spraying operation, identified as EU5, with a maximum capacity to use approximately 110 gallons of Turco pretreat per year. EU5 uses no control equipment, and exhausts to S4.
- (b) One (1) Titanium etching process, constructed in 1986, which uses Nitric Acid, identified as EU7, using approximately 1,155 gallons of 68%-72% Nitric Acid per year, with no control equipment, and exhausting to S4.
- (c) Several Laser Cutting Operations, identified together as EU9, constructed in 1988, all laser cutting operations (EU9) are controlled by Baghouse, BH5, and exhaust to S5.
- (d) Twenty-seven (27) natural gas-fired combustion units, identified as EU10, with the Trane units constructed in 2009 and all other units constructed in 2001, with a combined capacity of 8.27 MMBtu/hr, using no controls and venting inside the building. The following table describes the units in more detail:

<u>Equipment ID</u>	<u>MMBTU/hr rating</u>
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Equipment ID	MMBTU/hr rating
Radiant Heaters, Combustion Research Corp, M/N 0600NG (9 @ 0.24 MMBtu/hr each)	2.16
Radiant Heater, Combustion Research Corp, M/N 0610NG (3 @ 0.36 MMBtu/hr each)	1.08
Radiant Heaters, Combustion Research Corp, M/N 0945NG (2 @ 0.20 MMBtu/hr each)	0.40
HVAC, Trane, M/N YCH300B4HOGA	0.40
HVAC, Trane, M/N YCH108B4HOFA	0.40
HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Trane, M/N 2TXC0061AC3HCAA	0.40
HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Carrier, M/N 48TJE016	0.40
HVAC, Bryant, M/N 580DPV090180ABAA	0.40
HV, Reznor, M/N EEXL225	0.23
HV, Reznor, M/N XL200	0.20
HV, Reznor, M/N F200	0.20
HV, Dayton, M/N 3E230B	0.40
Total (27 units)	8.27

- (e) Various welding operations, including one (1) semi-automatic TIG welder, one (1) automatic TIG welder, nine (9) TIG line welders, one (1) orbital welder, two (2) TIG tack welding units, one (1) stud welding machine, and three (3) maintenance MIG welders. Maximum electrode usage is 1 pound per hour total for MIG and TIG operations. All welding operations are controlled with various dust collectors.
- (f) An acid cleaning department consisting of various steam cleaning and acid immersion tanks. This includes a sodium hydroxide tank, a nitric acid tank, a sodium chromate tank, and a chromic acid/phosphoric acid tank.
- (g) Various fabrication processes, consisting of forming, sizing, pressing, machining, grinding, cutting and drilling. Various pieces of equipment are located throughout the facility to accomplish these tasks. Some of this equipment includes argon fired heat treating furnaces, thermal presses, electric ovens, mills, lathes, drills, grinders, sanders, buffing wheels, and deburring brushes.
- (h) Non-destructive testing of parts for cracks and other defects.
- (i) Two (2) parts washers, each constructed after 1990, using mineral spirits as a solvent, each with a maximum solvent usage of 60 gallons per year, using no control and exhausting into the building.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F097-36238-00011, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

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

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

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

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

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

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

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

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

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

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

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

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

(C) Corrective actions taken.

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

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

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

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

- (a) All terms and conditions of permits established prior to F097-36238-00011 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted.

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

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

- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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

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

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

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

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

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

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to

whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 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.3 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.4 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.5 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.6 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.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers

and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

C.8 Performance Testing [326 IAC 3-6]

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

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

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

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

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

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

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

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) The address for report submittal is:

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

Indianapolis, Indiana 46204-2251

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

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) enclosed paint booth, constructed in 2002, identified as EU1, used to apply coatings to a limited quantity of small aviation components.

The booth has a maximum capacity to paint approximately 268 aerospace components of various types per month using the coating Sermetel W.

The booth has a maximum capacity to paint approximately 20 aerospace components of various types per month using the coating Aalseal 625.

EU1 uses dry filters, DF1, as control equipment, and exhausts to S1.

- (b) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU2, constructed in 1987, with a maximum coating capacity of 23.8 pounds of metal powder per hour; utilizing a Torit Dust Collector, identified as 2101, as particulate control and exhausting through vent S2.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

- (c) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (d) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (e) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (f) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU15, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate

control and exhausting through vent S8.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

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

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

D.1.1 Hazardous Air Pollutants (HAP) Limitations [326 IAC 2-4.1][326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable, the hazardous air pollutants emissions from the Torit Dust Collections (2100, 2101, 2102, 2156 and DC2) shall be limited as follows:

- (a) The emission of any single HAP shall not exceed the following:

HAP	Emission Limit (lb/hr)				
	2100	2101	2102	2156	DC2
Cobalt	0.38	0.19	0.38	0.38	0.38
Chromium	0.38	0.19	0.38	0.38	0.38
Nickel	0.38	0.19	0.38	0.38	0.38

- (b) The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for 2100.
- (c) The total emissions of any combination of HAPs shall not exceed 0.57 pounds per hour for 2101.
- (d) The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for 2102.
- (e) The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for 2156.
- (f) The total emissions of any combination of HAPs shall not exceed 1.14 pounds per hour for DC2.

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

D.1.2 FESOP Limitations [326 IAC 2-8-4][326 IAC 2-3]

- (a) Pursuant to 326 IAC 2-8-4 (FESOP), PM10 emissions from Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) shall not exceed the following:

PM10 Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
4.56	2.28	4.56	4.56	4.56

- (b) Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, PM2.5 emissions for the Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) shall not exceed the following:

PM2.5 Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
4.56	2.28	4.56	4.56	4.56

Compliance with these limitations, combined with the potential to emit PM10 and PM2.5 from other emission units at this source, shall limit the source-wide PTE of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-3 (Emission Offset) not applicable.

D.1.3 Particulate Matter (PM) PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, particulate matter (PM) emissions from the Torit Dust Collectors (2100, 2101, 2102, 2156, and DC2) shall not exceed the following:

PM Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
12.31	6.16	12.31	12.31	12.31

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

D.1.4 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, particulate emissions from the enclosed paint booth (EU1) and the eight (8) thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, and EU15), shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

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

A Preventive Maintenance Plan is required for the enclosed paint booth (EU1), the eight (8) thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, and EU15) and their control devices, identified as DF1, 2100, 2101, 2102, 2156, and DC2. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.6 Particulate Control

- (a) In order to assure compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4 the Torit Dust Collectors, identified as 2100, 2101, 2102, 2156 and DC2, shall be in operation and control emissions at all times the thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, and EU15) are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) day or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the result of any response actions take up to the time of notification.

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

D.1.7 Parametric Monitoring

- (a) The Permittee shall record the pressure drops across the Torit Dust Collectors, identified as 2100, 2101, 2102, 2156 and DC2, used in conjunction with thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, and EU15), at least once per day when any thermal spray coating booth is in operation. When for any one reading, the pressure drop across any Torit Dust Collector is outside the normal range, the Permittee shall take reasonable response. The normal range for these units is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.9 Testing Requirements [326 IAC 2-8-5][326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform chromium, cobalt, and nickel testing for the thermal spray paint booths Torit Dust Collectors (2100, 2101, 2102, 2156, and DC2), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration, on either Torit dust collector 2100, 2101, 2102, 2156, or DC2. Testing shall alternate between each Torit dust collector. The source will test the baghouse for which the longest period of time has passed since the last valid compliance test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the pressure drop across the Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) controlling the thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, and EU15). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) toluene pretreatment cleaning operation, constructed in 1987, using a toluene based precleaner called Turco pretreat on titanium parts in order to prevent scale formation during the thermal spraying operation, identified as EU5, with a maximum capacity to use approximately 110 gallons of Turco pretreat per year. EU5 uses no control equipment, and exhausts to S4.
- (b) One (1) Titanium etching process, constructed in 1986, which uses Nitric Acid, identified as EU7, using approximately 1,155 gallons of 68%-72% Nitric Acid per year, with no control equipment, and exhausting to S4.
- (c) Several Laser Cutting Operations, identified together as EU9, constructed in 1988, all laser cutting operations (EU9) are controlled by Baghouse, BH5, and exhaust to S5.
- (d) Twenty-seven (27) natural gas-fired combustion units, identified as EU10, with the Trane units constructed in 2009 and all other units constructed in 2001, with a combined capacity of 8.27 MMBtu/hr, using no controls and venting inside the building. The following table describes the units in more detail:

<u>Equipment ID</u>	<u>MMBTU/hr rating</u>
Radiant Heaters, Combustion Research Corp, M/N 0600NG (9 @ 0.24 MMBtu/hr each)	2.16
Radiant Heater, Combustion Research Corp, M/N 0610NG (3 @ 0.36 MMBtu/hr each)	1.08
Radiant Heaters, Combustion Research Corp, M/N 0945NG (2 @ 0.20 MMBtu/hr each)	0.40
HVAC, Trane, M/N YCH300B4HOGA	0.40
HVAC, Trane, M/N YCH108B4HOFA	0.40
HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Trane, M/N 2TXC0061AC3HCAA	0.40
HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Carrier, M/N 48TJE016	0.40
HVAC, Bryant, M/N 580DPV090180ABAA	0.40
HV, Reznor, M/N EEXL225	0.23
HV, Reznor, M/N XL200	0.20
HV, Reznor, M/N F200	0.20
HV, Dayton, M/N 3E230B	0.40
Total (27 units)	8.27

- (e) Various welding operations, including one (1) semi-automatic TIG welder, one (1) automatic TIG welder, nine (9) TIG line welders, one (1) orbital welder, two (2) TIG tack welding units, one (1) stud welding machine, and three (3) maintenance MIG welders. Maximum electrode usage is 1 pound per hour total for MIG and TIG operations. All welding operations are controlled with various dust collectors.

- (f) An acid cleaning department consisting of various steam cleaning and acid immersion tanks. This includes a sodium hydroxide tank, a nitric acid tank, a sodium chromate tank, and a chromic acid/phosphoric acid tank.
- (g) Various fabrication processes, consisting of forming, sizing, pressing, machining, grinding, cutting and drilling. Various pieces of equipment are located throughout the facility to accomplish these tasks. Some of this equipment includes argon fired heat treating furnaces, thermal presses, electric ovens, mills, lathes, drills, grinders, sanders, buffing wheels, and deburring brushes.
- (h) Non-destructive testing of parts for cracks and other defects.
- (i) Two (2) parts washers, each constructed after 1990, using mineral spirits as a solvent, each with a maximum solvent usage of 60 gallons per year, using no control and exhausting into the building.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, particulate emissions from the laser cutting operations (EU9), twenty-seven (27) gas-fired combustion units (EU10), and the various welding operations shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.2.2 326 IAC 8-3-2 (Cold Cleaner Degreaser Operating Requirements)

Pursuant to 326 IAC 8-3-2, the following shall apply to the cold cleaner degreaser parts washers:

- (a) The Permittee shall ensure the following control equipment and operating requirements are met:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) The Permittee shall ensure the following additional control equipment and operating requirements are met:

- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.3 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.2.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.3, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.

- (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1

NESHAP

Emissions Unit Description:

- (b) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU2, constructed in 1987, with a maximum coating capacity of 23.8 pounds of metal powder per hour; utilizing a Torit Dust Collector, identified as 2101, as particulate control and exhausting through vent S2.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

- (c) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (d) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (e) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (f) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU15, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-8-4(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart WWWWWW.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations NESHAP [40 CFR Part 63, Subpart WWWWWW]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWWWW (included as Attachment A to the operating permit), for the emission unit(s) listed above:

- (1) 40 CFR 63.11504(a)(1)(iii), (2), and (3)
- (2) 40 CFR 63.11505(a)(2), and (b)
- (3) 40 CFR 63.11506(a)
- (4) 40 CFR 63.11507(f)
- (5) 40 CFR 63.11508(a), (b), (c)(9), and (d)
- (6) 40 CFR 63.11509(a), (b), (c)(2), (c)(7), (d), (e), and (f)

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

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

Source Name: Aerofab, Division of Tube Processing Corporation
Source Address: 604 East LeGrande Avenue, Indianapolis, Indiana 46203
FESOP Permit No.: F097-36238-00011

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
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Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

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

Source Name: Aerofab, Division of Tube Processing Corporation
Source Address: 604 East LeGrande Avenue, Indianapolis, Indiana 46203
FESOP Permit No.: F097-36238-00011

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Source Name: Aerofab, Division of Tube Processing Corporation
 Source Address: 604 East LeGrande Avenue, Indianapolis, Indiana 46203
 FESOP Permit No.: F097-36238-00011

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

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attachment A

Federally Enforceable State Operating Permit (FESOP) Renewal No: F097-36238-00011

[Downloaded from the eCFR on July 15, 2013]

Electronic Code of Federal Regulations

Title 40: Protection of Environment

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

Subpart WWWW—National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Source: 73 FR 37741, July 1, 2008, unless otherwise noted.

Applicability and Compliance Dates

§ 63.11504 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a plating and polishing facility that is an area source of hazardous air pollutant (HAP) emissions and meets the criteria specified in paragraphs (a)(1) through (3) of this section.

(1) A plating and polishing facility is a plant site that is engaged in one or more of the processes listed in paragraphs (a)(1)(i) through (vi) of this section.

(i) Electroplating other than chromium electroplating (i.e., non-chromium electroplating).

(ii) Electroless or non-electrolytic plating.

(iii) Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying.

(iv) Dry mechanical polishing of finished metals and formed products after plating or thermal spraying.

(v) Electroforming.

(vi) Electropolishing.

(2) A plating or polishing facility is an area source of HAP emissions, where an area source is any stationary source or group of stationary sources within a contiguous area under common control that does not have the potential to emit any single HAP at a rate of 9.07 megagrams per year (Mg/yr) (10 tons per year (tpy)) or more and any combination of HAP at a rate of 22.68 Mg/yr (25 tpy) or more.

(3) Your plating and polishing facility uses or has emissions of compounds of one or more plating and polishing metal HAP, which means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, as defined in § 63.11511, "What definitions apply to this subpart?" With the exception of lead, plating and polishing metal HAP also include any of these metals in the elemental form.

(b) [Reserved]

[73 FR 37741, July 1, 2008, as amended at 76 FR 57919, Sept. 19, 2011]

§ 63.11505 What parts of my plant does this subpart cover?

(a) This subpart applies to each new or existing affected source, as specified in paragraphs (a)(1) through (3) of this section, at all times. A new source is defined in § 63.11511, "What definitions apply to this subpart?"

(1) Each tank that contains one or more of the plating and polishing metal HAP, as defined in § 63.11511, "What definitions apply to this subpart?", and is used for non-chromium electroplating; electroforming; electropolishing; electroless plating or other non-electrolytic metal coating operations, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

(2) Each thermal spraying operation that applies one or more of the plating and polishing metal HAP, as defined in § 63.11511, "What definitions apply to this subpart?"

(3) Each dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP, as defined in § 63.11511, "What definitions apply to this subpart?"

(b) An affected source is existing if you commenced construction or reconstruction of the affected source on or before March 14, 2008.

(c) An affected source is new if you commenced construction or reconstruction of the affected source after March 14, 2008.

(d) This subpart does not apply to any of the process units or operations described in paragraphs (d)(1) through (6) of this section.

(1) Process units that are subject to the requirements of 40 CFR part 63, subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks).

(2) Research and development process units, as defined in § 63.11511, "What definitions apply to this subpart?"

(3) Process units that are used strictly for educational purposes.

(4) Plating, polishing, coating, or thermal spraying conducted to repair surfaces or equipment.

(5) Dry mechanical polishing conducted to restore the original finish to a surface.

(6) Any plating or polishing process that uses process materials that contain cadmium, chromium, lead, or nickel (as the metal) in amounts less than 0.1 percent by weight, or that contain manganese in amounts less than 1.0 percent by weight (as the metal), as used. Information used to determine the amount of plating and polishing metal HAP in materials used in the plating or polishing process may include information reported on the Material Safety Data Sheet for the material, but is not required. For plating or polishing tanks, the HAP content may be determined from the final bath contents "as used" to plate or to polish.

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

[73 FR 37741, July 1, 2008, as amended at 76 FR 57919, Sept. 19, 2011]

§ 63.11506 What are my compliance dates?

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart no later than July 1, 2010.

(b) If you own or operate a new affected source for which the initial startup date is on or before July 1, 2008, you must achieve compliance with the provisions of this subpart no later than July 1, 2008.

(c) If you own or operate a new affected source for which the initial startup date is after July 1, 2008, you must achieve compliance with the provisions of this subpart upon initial startup of your affected source.

Standards and Compliance Requirements

§ 63.11507 What are my standards and management practices?

(a) If you own or operate an affected new or existing non-cyanide electroplating, electroforming, or electropolishing tank (hereafter referred to as an "electrolytic" process tank, as defined in § 63.11511, "What definitions apply to this subpart?") that contains one or more of the plating and polishing metal HAP and operates at a pH of less than 12, you must comply with the requirements in paragraph (a)(1), (2), or (3) of this section, and implement the applicable management practices in paragraph (g) of this section, as practicable.

(1) You must use a wetting agent/fume suppressant in the bath of the affected tank, as defined in § 63.11511, "What definitions apply to this subpart?" and according to paragraphs (a)(1)(i) through (iii) of this section.

(i) You must initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process.

(ii) You must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the bath, as in the original make-up of the bath, or in proportions such that the bath contents are returned to that of the original make-up of the bath.

(iii) If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressants to the tank to comply with this rule.

(2) You must capture and exhaust emissions from the affected tank to any one of the following emission control devices: composite mesh pad, packed bed scrubber, or mesh pad mist eliminator, according to paragraphs (a)(2)(i) and (ii) of this section.

(i) You must operate all capture and control devices according to the manufacturer's specifications and operating instructions.

(ii) You must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(3) You must cover the tank surface according to paragraph (a)(3)(i) or (ii) of this section.

(i) For batch electrolytic process tanks, as defined in § 63.11511, "What definitions apply to this subpart?", you must use a tank cover, as defined in § 63.11511, over all of the effective surface area of the tank for at least 95 percent of the electrolytic process operating time.

(ii) For continuous electrolytic process tanks, as defined in § 63.11511, "What definitions apply to this subpart?", you must cover at least 75 percent of the surface of the tank, as defined in § 63.11511, whenever the electrolytic process tank is in operation.

(b) If you own or operate an affected new or existing "flash" or short-term electroplating tank, as defined in § 63.11511, "What definitions apply to this subpart?", that uses or emits one or more of the plating and polishing metal HAP, you must comply with the requirements specified in paragraph (b)(1) or (b)(2), and implement the applicable management practices in paragraph (g) of this section, as practicable.

(1) You must limit short-term or "flash" electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(2) You must use a tank cover, as defined in § 63.11511, "What definitions apply to this subpart?", for at least 95 percent of the plating time.

(c) If you own or operate an affected new or existing process tank that is used both for short-term electroplating and for electrolytic processing of longer duration (i.e., processing that does not meet the definition of short-term or flash electroplating) and contains one or more of the plating and polishing metal HAP, you must meet the requirements specified in paragraph (a) or (b) of this section, whichever apply to the process operation, and implement the applicable management practices in paragraph (g) of this section, as practicable.

(d) If you own or operate an affected new or existing electroplating tank that uses cyanide in the plating bath, operates at pH greater than or equal to 12, and contains one or more of the plating and polishing metal HAP, you must comply with the requirements in paragraphs (d)(1) and (2) of this section:

(1) You must measure and record the pH of the bath upon startup of the bath, as defined in § 63.11511, "What definitions apply to this subpart?" No additional pH measurements are required.

(2) You must implement the applicable management practices in paragraph (g) of this section, as practicable.

(e) If you own or operate an affected new or existing dry mechanical polishing machine that emits one or more of the plating and polishing metal HAP, you must operate a capture system that captures particulate matter (PM) emissions from the dry mechanical polishing process and transports the emissions to a cartridge, fabric, or high efficiency particulate air (HEPA) filter, according to paragraphs (e)(1) and (2) of this section.

(1) You must operate all capture and control devices according to the manufacturer's specifications and operating instructions.

(2) You must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(f) If you own or operate an affected thermal spraying operation that applies one or more of the plating and polishing metal HAP, you must meet the applicable requirements specified in paragraphs (f)(1) through (3) of this section, and the applicable management practices in paragraph (g) of this section.

(1) For existing permanent thermal spraying operations, you must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a water curtain, fabric filter, cartridge, or HEPA filter, according to paragraphs (f)(1)(i) and (ii) of this section.

(2) For new permanent thermal spraying operations, you must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a fabric, cartridge, or HEPA filter, according to paragraphs (f)(2)(i) and (ii) of this section.

(3) For temporary thermal spraying operations, as defined in § 63.11511 "What definitions apply to this subpart?", you must meet the applicable requirements specified in paragraphs (f)(3)(i) and (ii) of this section.

(i) You must document the amount of time the thermal spraying occurs each day, and where it is conducted.

(ii) You must implement the applicable management practices specified in paragraph (g) of this section, as practicable.

(g) If you own or operate an affected new or existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP, you must implement the applicable management practices in paragraphs (g)(1) through (12) of this section, as practicable.

- (1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- (2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
- (3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
- (4) Use tank covers, if already owned and available at the facility, whenever practicable.
- (5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- (6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- (7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
- (8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- (9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- (10) Minimize spills and overflow of tanks, as practicable.
- (11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- (12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

§ 63.11508 What are my compliance requirements?

- (a) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with § 63.11509(b) of "What are my notification, reporting, and recordkeeping requirements?"
- (b) You must be in compliance with the applicable management practices and equipment standards in this subpart at all times.
- (c) To demonstrate initial compliance, you must satisfy the requirements specified in paragraphs (c)(1) through (11) of this section.
 - (1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), "What are my standards and management practices?", and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(1)(i) through (iv) of this section.
 - (i) You must add wetting agent/fume suppressant to the bath of each affected tank according to manufacturer's specifications and instructions.

(ii) You must state in your Notification of Compliance Status that you add wetting agent/fume suppressant to the bath according to manufacturer's specifications and instructions.

(iii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(2) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), "What are my standards and management practices?", and you use a control system, as defined in § 63.11511, "What definitions apply to this subpart?", to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(2)(i) through (v) of this section.

(i) You must install a control system designed to capture emissions from the affected tank and exhaust them to a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator.

(ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions.

(iii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(v) You must follow the manufacturer's specifications and operating instructions for the control systems at all times.

(3) If you own or operate an affected batch electrolytic process tank, as defined in § 63.11511, "What definitions apply to this subpart?" that contains one or more of the plating and polishing metal HAP and which is subject to the requirements in § 63.11507(a), "What are my standards and management practices?" and you use a tank cover, as defined in § 63.11511, to comply with § 11507(a), (b) or (c) of this subpart, you must demonstrate initial compliance according to paragraphs (c)(3)(i) through (iv) of this section.

(i) You must install a tank cover on the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.

(iii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(4) If you own or operate an affected continuous electrolytic process tank, as defined in § 63.11511, "What definitions apply to this subpart?" that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), "What are my standards and management practices?" and you cover the tank surface to comply with § 11507(a), (b) or (c) of this subpart, you must demonstrate initial compliance according to paragraphs (c)(4)(i) through (iv) of this section.

(i) You must cover at least 75 percent of the surface area of the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the surface cover in place whenever the continuous electrolytic process is in operation.

(iii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(b), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by limiting the plating time of the affected tank, you must demonstrate initial compliance according to paragraphs (c)(5)(i) through (iii) of this section.

(i) You must state in your Notification of Compliance Status that you limit short-term or flash electroplating to no more than 1 cumulative hour per day, or 3 cumulative minutes per hour of plating time.

(ii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(6) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(b), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must demonstrate initial compliance according to paragraphs (c)(6)(i) through (iv) of this section.

(i) You must install a tank cover on the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the plating time.

(iii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(7) If you own or operate an affected tank that contains one or more of the plating and polishing metal HAP, uses cyanide in the bath, and is subject to the management practices specified in § 63.11507(d), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(7)(i) through (iii) of this section.

(i) You must report in your Notification of Compliance Status the pH of the bath solution that was measured at startup, as defined in § 63.11511, according to the requirements of § 63.11507(d)(1).

(ii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11490(g), "What are my standards and management practices?", as practicable.

(8) If you own or operate an affected dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(e), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(8)(i) through (iii) of this section.

(i) You must install a control system that is designed to capture PM emissions from the polishing operation and exhaust them to a cartridge, fabric, or HEPA filter.

- (ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions.
- (iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- (9) If you own or operate an existing affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(f)(1), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(9)(i) through (iii) of this section.
- (i) You must install a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a water curtain, or a cartridge, fabric, or HEPA filter.
- (ii) You must state in your Notification of Compliance Status that you have installed and are operating the control system according to the manufacturer's specifications and instructions.
- (iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- (10) If you own or operate a new affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(f)(2), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(10)(i) through (iii) of this section.
- (i) You must install and operate a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a cartridge, fabric, or HEPA filter.
- (ii) You must state in your Notification of Compliance Status that you have installed and operate the control system according to the manufacturer's specifications and instructions.
- (iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- (11) If you own or operate an affected temporary thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(f)(3), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(11)(i) and (ii) of this section.
- (i) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.
- (ii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.
- (d) To demonstrate continuous compliance with the applicable management practices and equipment standards specified in this subpart, you must satisfy the requirements specified in paragraphs (d)(1) through (8) of this section.
- (1) You must always operate and maintain your affected source, including air pollution control equipment.
- (2) You must prepare an annual compliance certification according to the requirements specified in § 63.11509(c), "Notification, Reporting, and Recordkeeping," and keep it in a readily-accessible location for inspector review.
- (3) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), "What are my standards

and management practices?”, and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate continuous compliance according to paragraphs (d)(3)(i) through (iii) of this section.

(i) You must record that you have added the wetting agent/fume suppressant to the tank bath in the original make-up of the tank.

(ii) For tanks where the wetting agent/fume suppressant is a separate ingredient from the other tank additives, you must demonstrate continuous compliance according to paragraphs (d)(3)(ii) (A) and (B) this section.

(A) You must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank; or in proportion such that the bath is brought back to the original make-up of the tank.

(B) You must record each addition of wetting agent/fume suppressant to the tank bath.

(iii) You must state in your annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.

(4) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), “What are my standards and management practices?”, and you use a control system to comply with this subpart; an affected dry mechanical polishing operation that is subject to § 63.11507(e); or an affected thermal spraying operation that is subject to § 63.11507(f)(1) or (2), you must demonstrate continuous compliance according to paragraphs (d)(4)(i) through (v) of this section.

(i) You must operate and maintain the control system according to the manufacturer's specifications and instructions.

(ii) Following any malfunction or failure of the capture or control devices to operate properly, you must take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions.

(iii) You must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions.

(iv) You must record the results of all control system inspections, deviations from proper operation, and any corrective action taken.

(v) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(b), “What are my standards and management practices?” and you comply with § 11507(a), (b) or (c) of this subpart by limiting the plating time for the affected tank, you must demonstrate continuous compliance according to paragraphs (d)(5)(i) through (iii) of this section.

(i) You must limit short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(ii) You must record the times that the affected tank is operated each day.

(iii) You must state in your annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(6) If you own or operate an affected batch electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements of § 63.11507(a), “What are my standards and management

practices?" or a flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(b), and you comply with § 11507(a), (b) or (c) of this section by operating the affected tank with a cover, you must demonstrate continuous compliance according to paragraphs (d)(6)(i) through (iii) of this section.

(i) You must operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.

(ii) You must record the times that the tank is operated and the times that the tank is covered on a daily basis.

(iii) You must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.

(7) If you own or operate an affected continuous electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must demonstrate continuous compliance according to paragraphs (d)(7)(i) and (ii) of this section.

(i) You must operate the tank with at least 75 percent of the surface covered during all periods of electrolytic process operation.

(ii) You must state in your annual certification that you have operated the tank with 75 percent of the surface covered during all periods of electrolytic process operation.

(8) If you own or operate an affected tank or other operation that is subject to the management practices specified in § 63.11507(g), "What are my standards and management practices?", you must demonstrate continuous compliance according to paragraphs (d)(8)(i) and (ii) of this section.

(i) You must implement the applicable management practices during all times that the affected tank or process is in operation.

(ii) You must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

§ 63.11509 What are my notification, reporting, and recordkeeping requirements?

(a) If you own or operate an affected source, as defined in § 63.11505(a), "What parts of my plant does this subpart cover?", you must submit an Initial Notification in accordance with paragraphs (a)(1) through (4) of this section by the dates specified.

(1) The Initial Notification must include the information specified in § 63.9(b)(2)(i) through (iv) of the General Provisions of this part.

(2) The Initial Notification must include a description of the compliance method (e.g., use of wetting agent/fume suppressant) for each affected source.

(3) If you start up your affected source on or before July 1, 2008, you must submit an Initial Notification not later than 120 calendar days after July 1, 2008.

(4) If you startup your new affected source after July 1, 2008, you must submit an Initial Notification when you become subject to this subpart.

(b) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with paragraphs (b)(1) through (3) of this section.

- (1) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in § 63.11506, "What are my compliance dates?"
- (2) The Notification of Compliance Status must include the items specified in paragraphs (b)(2)(i) through (iv) of this section.
- (i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources.
 - (ii) Methods used to comply with the applicable management practices and equipment standards.
 - (iii) Description of the capture and emission control systems used to comply with the applicable equipment standards.
 - (iv) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements.
- (3) If a facility makes a change to any items in (b)(2)(i), iii, and (iv) of this section that does not result in a deviation, an amended Notification of Compliance Status should be submitted within 30 days of the change.
- (c) If you own or operate an affected source, you must prepare an annual certification of compliance report according to paragraphs (c)(1) through (7) of this section. These reports do not need to be submitted unless a deviation from the requirements of this subpart has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report.
- (1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that is subject to the requirements in § 63.11507(a)(1), "What are my standards and management practices?", you must state in your annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.
- (2) If you own or operate any one of the affected sources listed in paragraphs (c)(2)(i) through (iii) of this section, you must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions.
- (i) Electroplating, electroforming, or electropolishing tank that is subject to the requirements in § 63.11507(a), "What are my standards and management practices?", and you use a control system to comply with this subpart;
 - (ii) Dry mechanical polishing operation that is subject to § 63.11507(e); or
 - (iii) Permanent thermal spraying operation that is subject to § 63.11507(f)(1) or (2).
- (3) If you own or operate an affected flash or short-term electroplating tank that is subject to the requirements in § 63.11507(b), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by limiting the plating time of the affected tank, you must state in your annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.
- (4) If you own or operate an affected batch electrolytic process tank that is subject to the requirements of § 63.11507(a) or a flash or short-term electroplating tank that is subject to the requirements in § 63.11507(b), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.
- (5) If you own or operate an affected continuous electrolytic process tank that is subject to the requirements of § 63.11507(a), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must state in your annual certification that you have covered at least 75 percent of the surface area of the tank during all periods of electrolytic process operation.

(6) If you own or operate an affected tank or other affected plating and polishing operation that is subject to the management practices specified in § 63.11507(g), "What are my standards and management practices?" you must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

(7) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

(d) If you own or operate an affected source, and any deviations from the compliance requirements specified in this subpart occurred during the year, you must report the deviations, along with the corrective action taken, and submit this report to the delegated authority.

(e) You must keep the records specified in paragraphs (e)(1) through (3) of this section.

(1) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications.

(2) The records specified in § 63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part.

(3) The records required to show continuous compliance with each management practice and equipment standard that applies to you, as specified in § 63.11508(d), "What are my compliance requirements?"

(f) You must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining 3 years.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

Other Requirements and Information

§ 63.11510 What General Provisions apply to this subpart?

If you own or operate a new or existing affected source, you must comply with the requirements of the General Provisions (40 CFR part 63, subpart A) according to Table 1 of this subpart.

§ 63.11511 What definitions apply to this subpart?

Terms used in this subpart are defined in this section.

Batch electrolytic process tank means a tank used for an electrolytic process in which a part or group of parts, typically mounted on racks or placed in barrels, is placed in the tank and immersed in an electrolytic process solution as a single unit (i.e., as a batch) for a predetermined period of time, during which none of the parts are removed from the tank and no other parts are added to the tank, and after which the part or parts are removed from the tank as a unit.

Bath means the liquid contents of a tank, as defined in this section, which is used for electroplating, electroforming, electropolishing, or other metal coating processes at a plating and polishing facility.

Bench-scale means any operation that is small enough to be performed on a bench, table, or similar structure so that the equipment is not directly contacting the floor.

Capture system means the collection of components used to capture gases and fumes released from one or more emissions points and then convey the captured gas stream to a control device, as part of a complete control system.

A capture system may include, but is not limited to, the following components as applicable to a given capture system design: duct intake devices, hoods, enclosures, ductwork, dampers, manifolds, plenums, and fans.

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

Composite mesh pad means a type of control device similar to a mesh pad mist eliminator except that the device is designed with multiple pads in series that are woven with layers of material with varying fiber diameters, which produce a coalescing effect on the droplets or PM that impinge upon the pads.

Continuous electrolytic process tank means a tank that uses an electrolytic process and in which a continuous metal strip or other type of continuous substrate is fed into and removed from the tank continuously. This process is also called reel-to-reel electrolytic plating.

Control device means equipment that is part of a control system that collects and/or reduces the quantity of a pollutant that is emitted to the air. The control device receives emissions that are transported from the process by the capture system.

Control system means the combination of a capture system and a control device. The capture system is designed to collect and transport air emissions from the affected source to the control device. The overall control efficiency of any control system is a combination of the ability of the system to capture the air emissions (i.e., the capture efficiency) and the control device efficiency. Consequently, it is important to achieve good capture to ensure good overall control efficiency. Capture devices that are known to provide high capture efficiencies include hoods, enclosures, or any other duct intake devices with ductwork, dampers, manifolds, plenums, or fans.

Conversion coatings are coatings that form a hard metal finish on an object when the object is submerged in a tank bath or solution that contains the conversion coatings. Conversion coatings for the purposes of this rule include coatings composed of chromium, as well as the other plating and polishing metal HAP, where no electrical current is used.

Cyanide plating means plating processes performed in tanks that use cyanide as a major bath ingredient and that operate at pH of 12 or more, and use or emit any of the plating and polishing metal HAP, as defined in this section. Electroplating and electroforming are performed with or without cyanide. The cyanide in the bath works to dissolve the HAP metal added as a cyanide compound (e.g., cadmium cyanide) and creates free cyanide in solution, which helps to corrode the anode. These tanks are self-regulating to a pH of 12 due to the caustic nature of the cyanide bath chemistry. The cyanide in the bath is a major bath constituent and not an additive; however, the self-regulating chemistry of the bath causes the bath to act as if wetting agents/fume suppressants are being used and to ensure an optimum plating process. All cyanide plating baths at pH greater than or equal to 12 have cyanide-metal complexes in solution. The metal HAP to be plated is not emitted because it is either bound in the metal-cyanide complex or reduced at the cathode to elemental metal, and plated onto the immersed parts. Cyanide baths are not intentionally operated at pH less 12 since unfavorable plating conditions would occur in the tank, among other negative effects.

Deviation means any instance in which an affected source or an owner or operator of such an affected source:

- (1) Fails to meet any requirement or obligation established by this rule including, but not limited to, any equipment standard (including emissions and operating limits), management practice, or operation and maintenance requirement;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this rule and that is included in the operating permit for any affected facility required to obtain such a permit; or
- (3) Fails to meet any equipment standard (including emission and operating limits), management standard, or operation and maintenance requirement in this rule during startup, shutdown, or malfunction.

Dry mechanical polishing means a process used for removing defects from and smoothing the surface of finished metals and formed products after plating or thermal spraying with any of the plating and polishing metal HAP, as

defined in this section, using automatic or manually-operated machines that have hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles. The affected process does not include polishing with use of pastes, liquids, lubricants, or any other added materials.

Electroforming means an electrolytic process using or emitting any of the plating and polishing metal HAP, as defined in this section, that is used for fabricating metal parts. This process is essentially the same as electroplating except that the plated substrate (mandrel) is removed, leaving only the metal plate. In electroforming, the metal plate is self-supporting and generally thicker than in electroplating.

Electroless plating means a non-electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Electroless plating is also called non-electrolytic plating. Examples include, but are not limited to, chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

Electrolytic plating processes means electroplating and electroforming that use or emit any of the plating and polishing metal HAP, as defined in this section, where metallic ions in a plating bath or solution are reduced to form a metal coating on the surface of parts and products using electrical energy.

Electroplating means an electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metal ions in solution are reduced onto the surface of the work piece (the cathode) via an electrical current. The metal ions in the solution are usually replenished by the dissolution of metal from solid metal anodes fabricated of the same metal being plated, or by direct replenishment of the solution with metal salts or oxides; electroplating is also called electrolytic plating.

Electropolishing means an electrolytic process performed in a tank after plating that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a work piece is attached to an anode immersed in a bath, and the metal substrate is dissolved electrolytically, thereby removing the surface contaminant; electropolishing is also called electrolytic polishing. For the purposes of this subpart, electropolishing does not include bench-scale operations.

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

Filters, for the purposes of this part, include cartridge, fabric, or HEPA filters, as defined in this section.

Flash electroplating means an electrolytic process performed in a tank that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that is used no more than 3 cumulative minutes per hour or no more than 1 cumulative hour per day.

General Provisions of this part (40 CFR part 63, subpart A) means the section of the Code of Federal Regulations (CFR) that addresses air pollution rules that apply to all HAP sources addressed in part 63, which includes the National Emission Standards for Hazardous Air Pollutants (NESHAP).

HAP means hazardous air pollutant as defined from the list of 188 chemicals and compounds specified in the CAA Amendments of 1990; HAP are also called "air toxics." The five plating and polishing metal HAP, as defined in this section, are on this list of 188 chemicals.

High efficiency particulate air (HEPA) filter means a type of control device that uses a filter composed of a mat of randomly arranged fibers and is designed to remove at least 99.97 percent of airborne particles that are 0.3 micrometers or larger in diameter.

Maintenance is any process at a plating and polishing facility that is performed to keep the process equipment or the facility operating properly and is not performed on items to be sold as products.

Major facility for HAP is any facility that emits greater than 10 tpy of any HAP, or that emits a combined total of all HAP of over 25 tpy, where the HAP used to determine the total facility emissions are not restricted to only plating and polishing metal HAP or from only plating and polishing operations.

Mesh pad mist eliminator means a type of control device, consisting of layers of interlocked filaments densely packed between two supporting grids that remove liquid droplets and PM from the gas stream through inertial impaction and direct interception.

Metal coating operation means any process performed either in a tank that contains liquids or as part of a thermal spraying operation, that applies one or more plating and polishing metal HAP, as defined in this section, to the surface of parts and products used in manufacturing. These processes include but are not limited to: non-chromium electroplating; electroforming; electropolishing; non-electrolytic metal coating processes, such as chromate conversion coating, electroless nickel plating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal or flame spraying.

Metal HAP content of material used in plating and polishing is the HAP content as determined from an analysis or engineering estimate of the HAP contents of the tank bath or solution, in the case of plating, metal coating, or electropolishing; or the HAP content of the metal coating being applied in the case of thermal spraying. Safety data sheet (SDS) information may be used in lieu of testing or engineering estimates but is not required to be used.

New source means any affected source for which you commenced construction or reconstruction after March 14, 2008.

Non-cyanide electrolytic plating and electropolishing processes means electroplating, electroforming, and electropolishing that uses or emits any of the plating and polishing metal HAP, as defined in this section, performed without cyanide in the tank. These processes do not use cyanide in the tank and operate at pH values less than 12. These processes use electricity and add or remove metals such as metal HAP from parts and products used in manufacturing. Both electroplating and electroforming can be performed with cyanide as well.

Non-electrolytic plating means a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Non-electrolytic plating is also called electroless plating. Examples include chromate conversion coating, nickel acetate sealing, electroless nickel plating, sodium dichromate sealing, and manganese phosphate coating.

Packed-bed scrubber means a type of control device that includes a single or double packed bed that contains packing media on which PM and droplets impinge and are removed from the gas stream. The packed-bed section of the scrubber is followed by a mist eliminator to remove any water entrained from the packed-bed section.

Plating and polishing facility means a facility engaged in one or more of the following processes that uses or emits any of the plating and polishing metal HAP, as defined in this section: electroplating processes other than chromium electroplating (*i.e.*, non-chromium electroplating); electroless plating; other non-electrolytic metal coating processes performed in a tank, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; thermal spraying; and the dry mechanical polishing of finished metals and formed products after plating or thermal spraying. Plating is performed in a tank or thermally sprayed so that a metal coating is irreversibly applied to an object. Plating and polishing does not include any bench-scale processes.

Plating and polishing metal HAP means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. Any material that does not contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and does not contain manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as reported on the Material Safety Data Sheet for the material, is not considered to be a plating and polishing metal HAP.

Plating and polishing process tanks means any tank in which a process is performed at an affected plating and polishing facility that uses or has the potential to emit any of the plating and polishing metal HAP, as defined in this section. The processes performed in plating and polishing tanks include the following: electroplating processes other than chromium electroplating (*i.e.*, non-chromium electroplating) performed in a tank; electroless plating; and non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and electropolishing. This term does not include tanks containing solutions that are used to clean, rinse or wash parts prior to placing the parts in a plating and polishing process tank, or subsequent to removing the parts from a plating and polishing process tank. This term also does not include any bench-scale operations.

PM means solid or particulate matter that is emitted into the air.

Repair means any process used to return a finished object or tool back to its original function or shape.

Research and development process unit means any process unit that is used for conducting research and development for new processes and products and is not used to manufacture products for commercial sale, except in a *de minimis* manner.

Short-term plating means an electroplating process that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that is used no more than 3 cumulative minutes per hour or 1 hour cumulative per day.

Startup of the tank bath is when the components or relative proportions of the various components in the bath have been altered from the most recent operating period. Startup of the bath does not include events where only the tank's heating or agitation and other mechanical operations are turned back on after being turned off for a period of time.

Tank cover for batch process units means a solid structure made of an impervious material that is designed to cover the entire open surface of a tank or process unit that is used for plating or other metal coating processes.

Tank cover for continuous process units, means a solid structure or combination of structures, made of an impervious material that is designed to cover at least 75 percent of the open surface of the tank or process unit that is used for continuous plating or other continuous metal coating processes.

Temporary thermal spraying means a thermal spraying operation that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that lasts no more than 1 hour in duration during any one day and is conducted in situ. Thermal spraying that is conducted in a dedicated thermal spray booth or structure is not considered to be temporary thermal spraying.

Thermal spraying (also referred to as metal spraying or flame spraying) is a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a metallic coating is applied by projecting heated, molten, or semi-molten metal particles onto a substrate. Commonly-used thermal spraying methods include high velocity oxy-fuel (HVOF) spraying, flame spraying, electric arc spraying, plasma arc spraying, and detonation gun spraying. This operation does not include spray painting at ambient temperatures.

Water curtain means a type of control device that draws the exhaust stream through a continuous curtain of moving water to scrub out suspended PM.

Wetting agent/fume suppressant means any chemical agent that reduces or suppresses fumes or mists from a plating and polishing tank by reducing the surface tension of the tank bath.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57921, Sept. 19, 2011]

§ 63.11512 Who implements and enforces this subpart?

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

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that cannot be delegated to State, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of an alternative non-opacity emissions standard under 40 CFR 63.6(g), of the General Provisions of this part.

(2) Approval of an alternative opacity emissions standard under § 63.6(h)(9), of the General Provisions of this part.

(3) Approval of a major change to test methods under § 63.7(e)(2)(ii) and (f), of the General Provisions of this part. A “major change to test method” is defined in § 63.90.

(4) Approval of a major change to monitoring under § 63.8(f), of the General Provisions of this part. A “major change to monitoring” is defined in § 63.90.

(5) Approval of a major change to recordkeeping and reporting under § 63.10(f), of the General Provisions of this part. A “major change to recordkeeping/reporting” is defined in § 63.90.

§ 63.11513 [Reserved]

Table 1 to Subpart WWWWWW of Part 63—Applicability of General Provisions to Plating and Polishing Area Sources

As required in § 63.11510, “What General Provisions apply to this subpart?”, you must meet each requirement in the following table that applies to you.

Citation	Subject
63.1 ¹	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.6(a), (b)(1)-(b)(5), (c)(1), (c)(2), (c)(5), and (j)	Compliance with standards and maintenance requirements.
63.10(a), (b)(1), (b)(2)(i)-(iii), (xiv), (b)(3), (d)(1), (f)	Recordkeeping and reporting.
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality.

¹ Section 63.11505(e), “What parts of my plant does this subpart cover?”, exempts affected sources from the obligation to obtain title V operating permits.

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

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description
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Source Name:	Aerofab, Division of Tube Processing Corporation
Source Location:	604 East LeGrande Avenue, Indianapolis, IN 46203
County:	Marion (Center Township)
SIC Code:	3498 (Fabricated Pipe and Pipe Fittings), 3444 (Sheet Metal Work)
Permit Renewal No.:	F097-36238-00011
Permit Reviewer:	Tamera Wessel

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Aerofab, Division of Tube Processing Corporation relating to the operation of a stationary steel tubing fabrication and repair operation. On September 3, 2015, Aerofab, Division of Tube Processing Corporation submitted an application to the OAQ requesting to renew its operating permit. Aerofab, Division of Tube Processing Corporation was issued New Source Review and FESOP No. F097-30090-00011 on June 6, 2011.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) enclosed paint booth, constructed in 2002, identified as EU1, used to apply coatings to a limited quantity of small aviation components.

The booth has a maximum capacity to paint approximately 268 aerospace components of various types per month using the coating Sermetel W.

The booth has a maximum capacity to paint approximately 20 aerospace components of various types per month using the coating Aloseal 625.

EU1 uses dry filters, DF1, as control equipment, and exhausts to S1.

- (b) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU2, constructed in 1987, with a maximum coating capacity of 23.8 pounds of metal powder per hour; utilizing a Torit Dust Collector, identified as 2101, as particulate control and exhausting through vent S2.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

- (c) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (d) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (e) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (f) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU15, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

- (g) One (1) cleanup operation utilizing acetone and isopropyl alcohol as solvents and a maximum usage rate of 0.27 gallons per hour.

Emission Units and Pollution Control Equipment Removed and/or Not Constructed
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The source is removing the following emission unit from the permit:

- (a) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU16, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.
- (b) Metal conditioning operations, including plating, anodizing, and hardening. The plating process consists of a sodium hydroxide tank, a sulfuric acid tank, a nickel strike tank, and a nickel sulfamate tank.

On August 21, 2013, the source was issued a Significant Permit Revision for the addition of two (2) thermal spray coating booths, identified as EU15 and EU16. The thermal spray coating booth, EU16, has not yet been constructed and there are no plans to construct the booth in the near future. Therefore, the coating booth is being removed from the permit through this FESOP Renewal.

The insignificant metal conditioning operations have been removed from the source.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) One (1) toluene pretreatment cleaning operation, constructed in 1987, using a toluene based precleaner called Turco pretreat on titanium parts in order to prevent scale formation during the thermal spraying operation, identified as EU5, with a maximum capacity to use approximately 110 gallons of Turco pretreat per year. EU5 uses no control equipment, and exhausts to S4.
- (b) One (1) Titanium etching process, constructed in 1986, which uses Nitric Acid, identified as EU7, using approximately 1,155 gallons of 68%-72% Nitric Acid per year, with no control equipment, and exhausting to S4.
- (c) Several Laser Cutting Operations, identified together as EU9, constructed in 1988, all laser cutting operations (EU9) are controlled by Baghouse, BH5, and exhaust to S5.
- (d) Twenty-seven (27) natural gas-fired combustion units, identified as EU10, with the Trane units constructed in 2009 and all other units constructed in 2001, with a combined capacity of 8.27 MMBtu/hr, using no controls and venting inside the building. The following table describes the units in more detail:

Equipment ID	MMBTU/hr rating
Radiant Heaters, Combustion Research Corp, M/N 0600NG (9 @ 0.24 MMBtu/hr each)	2.16
Radiant Heater, Combustion Research Corp, M/N 0610NG (3 @ 0.36 MMBtu/hr each)	1.08
Radiant Heaters, Combustion Research Corp, M/N 0945NG (2 @ 0.20 MMBtu/hr each)	0.40
HVAC, Trane, M/N YCH300B4HOGA	0.40
HVAC, Trane, M/N YCH108B4HOFA	0.40
HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Trane, M/N 2TXC0061AC3HCAA	0.40
HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Carrier, M/N 48TJE016	0.40
HVAC, Bryant, M/N 580DPV090180ABAA	0.40
HV, Reznor, M/N EEXL225	0.23
HV, Reznor, M/N XL200	0.20
HV, Reznor, M/N F200	0.20
HV, Dayton, M/N 3E230B	0.40
Total (27 units)	8.27

- (e) Various welding operations, including one (1) semi-automatic TIG welder, one (1) automatic TIG welder, nine (9) TIG line welders, one (1) orbital welder, two (2) TIG tack welding units, one (1) stud welding machine, and three (3) maintenance MIG welders. Maximum electrode usage is 1 pound per hour total for MIG and TIG operations. All welding operations are controlled with various dust collectors.

- (f) An acid cleaning department consisting of various steam cleaning and acid immersion tanks. This includes a sodium hydroxide tank, a nitric acid tank, a sodium chromate tank, and a chromic acid/phosphoric acid tank.
- (g) Various fabrication processes, consisting of forming, sizing, pressing, machining, grinding, cutting and drilling. Various pieces of equipment are located throughout the facility to accomplish these tasks. Some of this equipment includes argon fired heat treating furnaces, thermal presses, electric ovens, mills, lathes, drills, grinders, sanders, buffing wheels, and deburring brushes.
- (h) Non-destructive testing of parts for cracks and other defects.
- (i) Two (2) parts washers, each constructed after 1990, using mineral spirits as a solvent, each with a maximum solvent usage of 60 gallons per year, using no control and exhausting into the building.

Existing Approvals

Since the issuance of New Source Review and FESOP No. F097-30090-00011 on June 6, 2011, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 097-34302-00011 issued on April 4, 2014;
- (b) Significant Permit Revision No. 097-33030-00011 issued on August 21, 2013; and
- (c) Significant Permit Revision No. 097-31173-00011 issued on March 20, 2012.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Marion County, Center Township.

Pollutant	Designation
SO ₂	Non-attainment effective October 4, 2013, for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the county.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Attainment effective July 11, 2013, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Marion County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **SO₂**
 U.S. EPA, in the Federal Register Notice 78 FR 47191 dated August 5, 2013, has designated Marion County, Center Township as nonattainment for SO₂. Therefore, SO₂ emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (d) **Other Criteria Pollutants**
 Marion County has been classified as attainment or unclassifiable in Indiana for CO, PM₁₀, NO₂, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	Greater than 250
PM ₁₀	Greater than 250
PM _{2.5}	Greater than 250
SO ₂	Less than 25
NO _x	Less than 25
VOC	Less than 25
CO	Less than 25
Single HAP	Greater than 10
Total HAP	Greater than 25

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM₁₀ and PM_{2.5} is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM₁₀ and PM_{2.5} emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after

issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM ₁₀ [*]	PM _{2.5} ^{**}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Spray Paint Booth (EU1)	0.05	0.05	0.05	-	-	2.23	-	-	-
Thermal Spray Coating Booth (EU2) 2101	27.0	10.0	10.0	0	0	0	0	2.50	0.83 Nickel
Thermal Spray Coating Booths (EU3, EU12) 2100	53.92	20.00	20.00	0	0	0	0	4.99	1.66 Nickel
Thermal Spray Coating Booths (EU4, EU11) 2102	53.92	20.00	20.00	0	0	0	0	4.99	1.66 Nickel
Thermal Spray Coating Booths (EU13, EU14) 2156	53.92	20.00	20.00	0	0	0	0	4.99	1.66 Nickel
Thermal Spray Coating Booth (EU15) DC2	53.92	20.00	20.00	0	0	0	0	4.99	1.66 Nickel
Toluene Pretreatment EU5	-	-	-	-	-	2.08	-	1.95	1.95 Toluene
Titanium Etching EU7	-	-	-	-	5.04	-	-	-	-
Laser Cutting EU9	0.58	0.58	0.58	-	-	-	-	-	-
Natural Gas Combustion	0.07	0.27	0.27	0.02	3.34	0.20	1.42	0.07	0.06 Hexane
Welding	0.05	0.05	0.05	-	-	-	-	0.01	negl.
Cleanup Operation	-	-	-	-	-	7.85	-	-	-
Small Parts Washers	-	-	-	-	-	0.49	-	-	-
Acid Cleaning Dept. ¹	-	-	-	-	-	-	-	-	-
Various Fabrication Processes ²	-	-	-	-	-	-	-	-	-
Total PTE of Entire Source	243.42	90.94	90.94	0.02	8.59	12.82	1.42	24.49	<10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	NA	250	250	250	NA	NA
Emission Offset Major Source Thresholds	NA	NA	NA	100	NA	NA	NA	NA	NA

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
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". **PM _{2.5} listed is direct PM _{2.5} . 1) All acid cleaning activities, with the exception of the nitric acid tank for the titanium etching activity, result in no VOC or HAP emissions. 2) None of the emission units comprising the various fabrication processes are expected to generate significant amounts of criteria or HAP pollutants.									

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

Compliance Assurance Monitoring (CAM):

- (a) 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.

New Source Performance Standards (NSPS):

- (a) *40 CFR 60, Subpart Dc*
 The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are still not included in the permit since all of

the natural gas-fired units have a maximum heat input capacity of less than 10 MMBtu per hour and none meet the definition of a steam generating unit, as defined in 40 CFR 60.41c.

- (b) *40 CFR 60, Subpart EE*
The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture 40 CFR 60, Subpart EE, are still not included in the permit since this source does not coat furniture.
- (c) *40 CFR 60, Subpart MM*
The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM, are not included in the permit since this source only coats aerospace equipment.
- (d) *40 CFR 60, Subpart TT*
The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT, are not included in the permit since this source does not coat coil.
- (e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) *40 CFR 63, Subpart N*
The requirements of the National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR 63, Subpart N), are not included in the permit for the insignificant metal cleaning operations because the source does not perform chromium electroplating, decorative chromium electroplating, or chromium anodizing.
- (b) *40 CFR 63, Subpart HHHHHH*
The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH), are not included in the permit because this subpart applies to spray application of coatings and for the purposes of this subpart, the thermal spray coating booths are not included in the definition of spray-applied coating operations.
- (c) *40 CFR 63, Subpart WWWWWW*
This source is subject to the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations (40 CFR 63, Subpart WWWWWW), because they are an area source that has thermal spraying operations that apply one or more of the plating and polishing metal HAP.

The units subject to this rule include the following:

- (1) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU2, constructed in 1987, with a maximum coating capacity of 23.8 pounds of metal powder per hour; utilizing a Torit Dust Collector, identified as 2101, as particulate control and exhausting through vent S2.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.
- (2) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating

capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (3) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (4) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.

Under 40 CFR 63, Subpart WWWWWW - Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (5) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU15, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11504(a)(1)(iii), (2), and (3)
- (2) 40 CFR 63.11505(a)(2), and (b)
- (3) 40 CFR 63.11506(a)
- (4) 40 CFR 63.11507(f)
- (5) 40 CFR 63.11508(a), (b), (c)(9), and (d)
- (6) 40 CFR 63.11509(a), (b), (c)(2), (c)(7), (d), (e), and (f)

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

- (d) *40 CFR 63, Subpart XXXXXX*

The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit because the source's SIC codes (3444, 3498) are not included in the EPA source category list for the nine metal fabrication and finishing source categories. Although the source engages in welding operations emitting chromium, it does not qualify as one of the nine source categories, rendering this rule not applicable.

- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

- (a) *326 IAC 2-2 (Prevention of Significant Deterioration(PSD))*
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) *326 IAC 2-6 (Emission Reporting)*
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.
- (c) *326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))*
The unlimited potential to emit of HAPs from the source is greater than ten (10) tons per year for any single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the source to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (d) *326 IAC 2-8-4 (FESOP)*
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (e) *326 IAC 5-1 (Opacity Limitations)*
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

These requirements apply pursuant to 326 IAC 5-1-1(c)(5) because the source is located in Marion County, not in the area of Washington Township east of Fall Creek nor the area of Franklin Township south of Thompson Road and east of Five Points Road. The source is located in Center Township.

- (f) *326 IAC 6.5 PM Limitations Except Lake County*
This source is subject to 326 IAC 6.5 because it is located in Marion County, its PM PTE (or limited PM PTE) is equal to or greater than 100 tons per year or actual emissions are greater than 10 tons per year. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2(a) applies. PM emissions from each of the particulate emitting processes shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

- (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)**
This source is not subject to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because it does not have potential fugitive particulate matter emissions of twenty-five (25) tons per year or more.
- (i) **326 IAC 8-1-6 (VOC Rules: New facilities; general reduction requirements)**
None of the emissions units operated at this source is subject to the requirements of 326 IAC 8-1-6, because none has potential VOC emissions of twenty-five (25) tons per year or more.
- (j) **326 IAC 12 (New Source Performance Standards)**
See Federal Rule Applicability Section of this TSD.
- (k) **326 IAC 20 (Hazardous Air Pollutants)**
See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Paint Booth EU1

- (a) **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
Pursuant to 326 IAC 6-3-1(c)(3) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to 326 IAC 6-3-2, because a more stringent particulate matter limitation under 326 IAC 6.5 applies.
- (b) **326 IAC 8-2 (Surface Coating Emission Limitations)**
The source is located in Marion County and paint booth EU1 was constructed after 1990, however it has a potential to emit and actual emissions of less than 15 pounds of VOC per day, therefore the requirements of 326 IAC 8-2 do not apply.
- (c) There are no other 326 IAC 8 rules that apply.

Thermal Spray Booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, EU15)

- (a) **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
Pursuant to 326 IAC 6-3-1(c)(3) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to 326 IAC 6-3-2, because a more stringent particulate matter limitation under 326 IAC 6.5 applies.
- (b) **326 IAC 8-2-9 (Miscellaneous metal and plastic parts coating operations)**
The source is located in Marion County and each spray booth, EU2, EU3, EU4, EU11, EU12, EU13, EU14, and EU15 were constructed after 1990, perform a metal coating process and the source is under the SIC major group 34. However, the thermal spray booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, and EU15) do not use a VOC coating. Therefore, the thermal spray booths are not subject to 326 IAC 8-2-9.
- (c) **326 IAC 8-17 (Industrial Solvent Cleaning Operations)**
The source is located in Marion County and uses a cleaning solvent containing VOC. However, 326 IAC 8-17 only applies to industries located in Lake and Porter Counties. Therefore, the cleanup operation is not subject to 326 IAC 8-17.
- (d) There are no other 326 IAC 8 rules that apply.

Toluene Pretreatment

- (a) There are no other 326 IAC 8 rules that apply.

Laser Cutting

- (a) *326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)*
Pursuant to 326 IAC 6-3-1(c)(3) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to 326 IAC 6-3-2, because a more stringent particulate matter limitation under 326 IAC 6.5 applies.

Natural Gas-Fired Units

- (a) *326 IAC 6-2 (Emission Limitations for Sources of Indirect Heating)*
Pursuant to 326 IAC 6-2-1, the source is not subject to 326 IAC 6-2, since none of the natural gas-fired units are sources of indirect heating.
- (b) *326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)*
This source is not subject to 326 IAC 7-1.1-1 because the potential to emit sulfur dioxide from each natural gas-fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.

Welding Operations

- (a) *326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)*Pursuant to 326 IAC 6-3-1(c)(3) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to 326 IAC 6-3-2, because a more stringent particulate matter limitation under 326 IAC 6.5 applies.

Parts Washers

- (a) *326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements)*
Pursuant to 326 IAC 8-3-1(a)(2), the requirements of 326 IAC 8-3-2 apply to the cold cleaner parts washers.

Pursuant to 326 IAC 8-3-2, the following shall apply to the cold degreaser parts washers:

- (a) The Permittee shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.

- (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) The Permittee shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.
- (b) *326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)*
Pursuant to 326 IAC 8-3-8, the cold cleaner parts washers are subject to the following:
- (a) Pursuant to 326 IAC 8-3-8(b)(2), no person shall operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
 - (b) Pursuant to 326 IAC 8-3-8(c)(2), the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- Pursuant to 326 IAC 8-3-8(d), these records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination and monitoring requirements applicable to this source are as follows:

(a)

Emission Unit	Control Device	Operating Parameters	Frequency of Testing
EU2	Torit Dust Collector 2101	Pressure Drop	Once per day
EU3 and EU12	Torit Dust Collector 2100		
EU4 and EU11	Torit Dust Collector 2102		
EU13 and EU14	Torit Dust Collector 2156		
EU15	Torit Dust Collector DC2		

(b) In order to assure compliance with the single HAP allowable limit, the baghouse must achieve a control efficiency greater than 90%. Therefore, the source must perform stack testing to demonstrate compliance with 326 IAC 2-8-4 emission limitations (FESOP).

Emission Unit	Control Device	Pollutant	Frequency of Testing
Thermal Spray Coating Booth EU2	Torit Dust Collector 2101	Chromium, Cobalt, and Nickel	Once every five(5) years on either Torit Dust Collector 2100, 2101, 2102, 2156, or DC2. The source will test the baghouse for which the longest period of time has passed since the last valid compliance test.
Thermal Spray Coating Booths EU3 and EU12	Torit Dust Collector 2100		
Thermal Spray Coating Booths EU4 and EU11	Torit Dust Collector 2102		
Thermal Spray Coating Booths EU13 and EU14	Torit Dust Collector 2156		
Thermal Spray Coating Booth EU15	Torit Dust Collector DC2		

Proposed Changes

The following changes listed below are due to the proposed revision.

- (1) Emission unit descriptions were revised in the A and D sections to account for the removal of the thermal spray coating booth, identified as EU16, from the permit, and to update to the current list of insignificant activities.
- (2) Condition D.1.7 - Visible Emissions Notations has been removed from the permit since the source is required to perform parametric monitoring of the Torit Dust collectors in accordance with Condition D.1.8. IDEM, OAQ currently does not require two compliance monitoring methods for a single control device.
- (2) Various insignificant activities have been included in Section D.2 which are subject to the particulate matter requirements of 326 IAC 6.5-1-2 as shown in Condition D.2.1.
- (3) Cold cleaner degreaser requirements, listed in Section D.2, have been updated.
- (4) A Preventive Maintenance Plan requirement, Condition D.2.4, has been added for the facilities listed in Section D.2.
- (5) Section E.1 has been added to include the applicable requirements of NESHAP (40 CFR Part 63, Subpart WWWWWW)

Additional Changes

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

- (1) IDEM, OAQ has clarified Section B - Preventive Maintenance Plan to be consistent with the rule.
- (2) The rule cite for trivial activities listed in Condition B.16 has been updated.
- (3) IDEM changed the Section C Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
- (4) IDEM clarified Condition C.11 Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- (5) IDEM added "where applicable" to the lists in Section C.16 - General Record Keeping Requirements to more closely match the underlying rule.
- (6) Rule cites have changed for requirements listed in the D sections.
- (7) Additional typographical and grammatical errors have been corrected.

Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

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

The Permittee owns and operates a stationary ~~Steelsteel tubing/Fabrication Repair~~. **fabrication and repair operation.**

Source Address:	604 East LeGrande Avenue, Indianapolis, Indiana 46203
General Source Phone Number:	317-782-9628
SIC Code:	3498 (Fabricated Pipe and Pipe Fittings), 3444 (Sheet Metal Work)
County Location:	Marion (Center Township)
Source Location Status:	Nonattainment for PM2.5 SO ₂ standard

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

This stationary source also includes the following insignificant activities:

...

- (d) ~~Forty-one~~ **Twenty-seven (4427)** natural gas-fired combustion units, identified as EU10, with the Trane units constructed in 2009 and all other units constructed in 2001, with a combined capacity of ~~44.038.27~~ **41.038.27** MMBtu/hr, using no controls and venting inside the building. The following table describes the units in more detail:

Equipment ID	MMBTU/hr rating
Radiant Heaters, Combustion Research Corp, M/N 0600NG (249 @ 0.24 MMBtu/hr each)	5.762.16
Radiant Heater, Combustion Research Corp, M/N 0800NG 0610NG (3 @ 0.36 MMBtu/hr each)	0.131.08
Radiant Heaters, Combustion Research Corp, M/N 0845NG 0945NG (2 @ 0.20 MMBtu/hr each)	0.40
Radiant Heater, Combustion Research Corp, M/N 0900NG	0.11
HVAC, Trane, M/N YCH300B4HOGA	0.40
HVAC, Trane, M/N YCH108B4HOFA	0.40
HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Trane, M/N 2TXC0061AC3HCAA	0.40
HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Carrier, M/N 48TJE016	0.40
HVAC, Bryant, M/N 580DPV090180ABAA	0.40
HV, Reznor, M/N EEXL225	0.23
HV, Reznor, M/N XL200	0.20
HV, Reznor, M/N F200	0.20
HV, Dayton, M/N 3E230B	0.40
Total (41 4427 units)	44.038.27 41.038.27

- (e) Various welding operations, including ~~four~~ **one (4-1)** semi-automatic TIG welders, ~~one (1) automatic TIG welder~~, ~~eleven~~ **nine (449)** TIG line welders, ~~one (1) orbital welder~~, ~~four~~ **two (42)** TIG tack welding stations, ~~one (1) stud welding machine~~, and three (3) ~~maintenance MIG welding stations~~ **welders**. Maximum electrode usage is 1 pound per hour ~~each~~ **total** for MIG and TIG operations. All welding operations are controlled with various dust collectors.
- (f) An acid cleaning department consisting of various steam cleaning and acid immersion tanks. This includes a sodium hydroxide tank, a nitric acid tank, a sodium chromate tank, and a chromic acid/phosphoric acid tank. ~~All acid cleaning activities with the exception of the nitric acid tank for the titanium etching activity (accounted for in emission calculations) result in no VOC or HAP emissions, and are not included in the emission calculations.~~

- (g) Various fabrication processes, consisting of forming, sizing, pressing, machining, grinding, cutting and drilling. Various pieces of equipment are located throughout the facility to accomplish these tasks. Some of this equipment includes argon fired heat treating furnaces, thermal presses, electric ovens, mills, lathes, drills, grinders, sanders, buffing wheels, and deburring brushes. ~~None of this equipment is expected to generate significant amounts of criteria or HAP pollutants, in addition, many of these emission sources are considered exempt pursuant to 326 IAC 2-1.1-3.~~
- ~~(h) Metal conditioning emissions, including plating, anodizing, and hardening. The plating process consists of a sodium hydroxide tank, a sulfuric acid tank, a nickel strike tank, and a nickel sulfamate tank. None of the materials used in the plating process consist of VOC or HAP emissions.~~
- (ih) Non-destructive testing of parts for cracks and other defects.
- (ji) ~~One~~**Two (12)** parts washers, **each** constructed after 1990, using mineral spirits as a solvent, **each** with a maximum solvent usage of 60 gallons per year, using no control and exhausting into the building.

...

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

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

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

The Permittee shall implement the PMPs.

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The Permittee shall implement the PMPs.

- (bc) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. (The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).)
- (ed) 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.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(4042). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
 - ~~(4) The potential to emit greenhouse gasses (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.~~

- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than ~~one~~**two hundred fifty (400250)** tons per twelve (12) consecutive month period.

...

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

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

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

...

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

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

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

- (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.
- Records of required monitoring information include the following, **where applicable:**
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (b) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU2, constructed in 1987, with a maximum coating capacity of 23.8 pounds of metal powder per hour; utilizing a Torit Dust Collector, identified as 2101, as particulate control and exhausting through vent S2.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

- (c) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (d) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (e) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (f) ~~Two~~ **One** (21) thermal spray coating ~~booths~~ **booth**, applying powder coatings to metal parts,

identified as EU15 and EU16, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

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

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

D.1.1 Hazardous Air Pollutants (HAP) Limitations [326 IAC 2-4.1][326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-4.1 (~~MACT~~**Major Sources of Hazardous Air Pollutants**) not applicable, the hazardous air pollutants emissions from the Torit Dust Collections (2100, 2101, 2102, 2156 and DC2) shall be limited as follows:

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

D.1.2 FESOP Limitations [326 IAC 2-8-4][326 IAC 2-4.1-53]

(a) Pursuant to 326 IAC 2-8-4 (FESOP), PM10 emissions from Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) shall not exceed the following:

PM10 Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
4.56	2.28	4.56	4.56	4.56

(b) Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-4.1-53 (~~Nonattainment New Source Review~~**Emission Offset**) not applicable, PM2.5 emissions for the Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) shall not exceed the following:

PM2.5 Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
4.56	2.28	4.56	4.56	4.56

Compliance with these limitations, combined with the potential to emit PM10 and PM2.5 from other emission units at this source, shall limit the source-wide PTE of PM10 and PM2.5, to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-4.1-53 (~~Nonattainment New Source Review~~**Emission Offset**) not applicable.

D.1.3 Particulate Matter (PM) PSD Minor Limits [326 IAC 2-2]

In order to render the **requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))** requirements not applicable, particulate matter (PM) emissions from the Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) shall not exceed the following:

PM Emission Limit (lb/hr)				
2100	2101	2102	2156	DC2
12.31	6.16	12.31	12.31	12.31

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

D.1.4 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, particulate emissions from the enclosed paint booth ((EU1) and the ~~nineeight (98)~~ thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, and EU15, and EU46), shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of ~~exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).~~

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

A Preventive Maintenance Plan is required for the enclosed paint booth ((EU1), the ~~nineeight (98)~~ thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, and EU15 and EU46) and their control devices, identified as DF1, 2100, 2101, 2102, 2156, and DC2. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.6 Particulate Control

(a) In order to ~~comply~~ **assure compliance** with Conditions D.1.1, D.1.2, D.1.3, and D.1.4 the Torit Dust Collectors, identified as 2100, 2101, 2102, 2156 and DC2, shall be in operation and control emissions at all times the thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, and EU15, and EU46) are in operation.

...

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

D.1.7 Visible Emissions Notations

- (a) ~~Visible emission notations of the Torit Dust Collectors, identified as 2100, 2101, 2102, 2156 and DC2, exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~
- (b) ~~For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- (c) ~~In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- (d) ~~A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- (e) ~~If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~

D.1.87 Parametric Monitoring

- (a) The Permittee shall record the pressure drops across the Torit Dust Collectors, identified as 2100, 2101, 2102, 2156 and DC2, used in conjunction with thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, **and EU15, and EU16**), at least once per day when any thermal spray coating booth is in operation. When for any one reading, the pressure drop across any Torit Dust Collector is outside the normal range, **the Permittee shall take reasonable response. The normal range for these units is a pressure drop between of 1.0 to and 6.0 inches of water unless a different upper-bound or lower-bound value for this or a range is determined established** during the ~~last~~**latest** stack test, ~~the Permittee shall take reasonable response.~~ Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take ~~reasonable~~**response** steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure **drop** shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least **once** every six (6) months.

D.1.98 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- ...

D.1.409 Testing Requirements [326 IAC 2-8-5][326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform chromium, cobalt and nickel testing for the thermal spray paint booths ~~baghouse~~**Torit Dust Collectors (2100, 2101, 2102, 2156, and DC2)**, ~~no later than one hundred eighty (180) days after initial startup of the 2 thermal spray coating booths controlled by baghouse DC2,~~ utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of ~~this~~**the most recent** valid compliance demonstration, on either Torit dust collector 2100, 2101, 2102, 2156, or DC2. **Testing shall alternate between each Torit dust collector.** The source will test the baghouse for which the longest period of time has passed since the last valid compliance test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.410 Record Keeping Requirements

- (a) ~~To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the visible emission notations of the Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).~~
- (ba) To document the compliance status with Condition D.1.87, the Permittee shall maintain daily records of the pressure drop across the Torit Dust Collectors (2100, 2101, 2102, 2156 and DC2) controlling the thermal spray coating booths (EU2, EU3, EU4, EU11, EU12, EU13, EU14, **and EU15, and EU16**). The Permittee shall include in its daily

record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

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

....

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: ~~Insignificant Activities:~~

- (a) **One (1) toluene pretreatment cleaning operation, constructed in 1987, using a toluene based precleaner called Turco pretreat on titanium parts in order to prevent scale formation during the thermal spraying operation, identified as EU5, with a maximum capacity to use approximately 110 gallons of Turco pretreat per year. EU5 uses no control equipment, and exhausts to S4.**
- (b) **One (1) Titanium etching process, constructed in 1986, which uses Nitric Acid, identified as EU7, using approximately 1,155 gallons of 68%-72% Nitric Acid per year, with no control equipment, and exhausting to S4.**
- (ac) Several Laser Cutting Operations, identified together as EU9, constructed in 1988, all laser cutting operations (EU9) are controlled by Baghouse, BH5, and exhaust to S5.
- (bd) ~~Forty-one~~**Twenty-seven (4127)** natural gas-fired combustion units, identified as EU10, with the Trane units constructed in 2009 and all other units constructed in 2001, with a combined capacity of ~~41.03~~**38.27** MMBtu/hr, using no controls and venting inside the building. The following table describes the units in more detail:

<u>Equipment ID</u>	<u>MMBTU/hr rating</u>
Radiant Heaters, Combustion Research Corp, M/N 0600NG (249 @ 0.24 MMBtu/hr each)	5.76 2.16
Radiant Heater, Combustion Research Corp, M/N 0800NG 0610NG (3 @ 0.36 MMBtu/hr each)	0.13 1.08
Radiant Heaters, Combustion Research Corp, M/N 0845NG 0945NG (2 @ 0.20 MMBtu/hr each)	0.40
Radiant Heater, Combustion Research Corp, M/N 0900NG	0.14
HVAC, Trane, M/N YCH300B4HOGA	0.40
HVAC, Trane, M/N YCH108B4HOFA	0.40
HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Trane, M/N 2TXC0061AC3HCAA	0.40
HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Carrier, M/N 48TJE016	0.40
HVAC, Bryant, M/N 580DPV090180ABAA	0.40
HV, Reznor, M/N EEXL225	0.23
HV, Reznor, M/N XL200	0.20

HV, Reznor, M/N F200	0.20
HV, Dayton, M/N 3E230B	0.40
Total (4427 units)	41.038.27

- (ee) Various welding operations, including ~~four~~**one (4-1)** semi-automatic TIG welders, ~~one (1)~~**automatic TIG welder**, ~~eleven~~**nine (449)** TIG line welders, ~~one (1)~~**orbital welder**, ~~four~~**two (42)** TIG tack welding stations, ~~one (1)~~**stud welding machine**, and three (3) ~~maintenance MIG welding stations~~**welders**. Maximum electrode usage is 1 pound per hour ~~each~~**total** for MIG and TIG operations. All welding operations are controlled with various dust collectors.
- (f) **An acid cleaning department consisting of various steam cleaning and acid immersion tanks. This includes a sodium hydroxide tank, a nitric acid tank, a sodium chromate tank, and a chromic acid/phosphoric acid tank.**
- (g) **Various fabrication processes, consisting of forming, sizing, pressing, machining, grinding, cutting and drilling. Various pieces of equipment are located throughout the facility to accomplish these tasks. Some of this equipment includes argon fired heat treating furnaces, thermal presses, electric ovens, mills, lathes, drills, grinders, sanders, buffing wheels, and deburring brushes.**
- (h) **Non-destructive testing of parts for cracks and other defects.**
- (di) ~~One~~**Two (42)** parts washers, ~~each~~ constructed after 1990, using mineral spirits as a solvent, ~~each~~ with a maximum solvent usage of 60 gallons per year, using no control and exhausting into the building.

(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)~~**2-8-4(1)**]

D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, particulate emissions from the ~~laser cutting operations (EU9), forty-one~~**twenty-seven (4427)** gas fired combustion units (EU10) and the ~~various~~ welding operations shall not ~~allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of~~ **exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf).**

D.2.2 326 IAC 8-3-2 (Cold Cleaner Degreaser Operating Requirements)

Pursuant to 326 IAC 8-3-2, the following shall apply to the cold ~~cleaner~~ degreaser parts washers:
 ...

D.2.3 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), ~~on and after January 15, 2015,~~ the Permittee shall not operate a cold ~~cleaner~~**cleaning** degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

- (b) ~~The owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:~~

- ~~(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):~~
- ~~(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~
 - ~~(B) A water cover when solvent used is insoluble in, and heavier than, water.~~
 - ~~(C) A refrigerated chiller.~~
 - ~~(D) Carbon adsorption.~~
 - ~~(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.~~
- ~~(2) Ensure that the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.~~
- ~~(3) If used, solvent spray:~~
- ~~(A) must be a solid, fluid stream; and~~
 - ~~(B) shall be applied at a pressure that does not cause excessive splashing.~~

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.2.42.5 Record Keeping Requirements [326 IAC 8-3-8]

- ~~(a) On and after January 15, 2015, in order to document the compliance status with Condition D.2.3, the Permittee shall maintain each of the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period:~~
- ~~(1) The name and address of the solvent supplier.~~
 - ~~(2) The date of purchase (or invoice/bill date of contract servicer indicating service date).~~
 - ~~(3) The type of solvent purchased.~~
 - ~~(4) The total volume of the solvent purchased~~
 - ~~(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).~~
- ~~(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.~~

SECTION E.1

NESHAP

Emissions Unit Description:

- (b) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU2, constructed in 1987, with a maximum coating capacity of 23.8 pounds of metal powder per hour; utilizing a Torit Dust Collector, identified as 2101, as particulate control and exhausting through vent S2.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

- (c) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU3, constructed in 1987, and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2100, as particulate control and exhausting through vent S3.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (d) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU4, constructed in 1987, and EU11, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2102, as particulate control and exhausting through vent S6.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (e) Two (2) thermal spray coating booths, applying powder coatings to metal parts, identified as EU13, constructed in 2011, and EU14, constructed in 2012, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as 2156, as particulate control and exhausting through vent S7.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, these thermal spray coating booths are considered affected facilities.

- (f) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU15, approved for construction in 2013, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each; utilizing a Torit Dust Collector, identified as DC2, as particulate control and exhausting through vent S8.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, this thermal spray coating booth is considered an affected facility.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-8-4(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart WWWWWW.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations NESHAP [40 CFR Part 63, Subpart WWWWWW]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWWWW (included as Attachment A to the operating permit), for the emission unit(s) listed above:

- (1) 40 CFR 63.11504(a)(1)(iii), (2), and (3)
(2) 40 CFR 63.11505(a)(2), and (b)
(3) 40 CFR 63.11506(a)
(4) 40 CFR 63.11507(f)
(5) 40 CFR 63.11508(a), (b), (c)(9), and (d)
(6) 40 CFR 63.11509(a), (b), (c)(2), (c)(7), (d), (e), and (f)

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

Conclusion

The operation of this stationary steel tubing fabrication and repair operation shall be subject to the conditions of the attached FESOP Renewal No. F097-36238-00011.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Tamera Wessel at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-8530 or toll free at 1-800-451-6027 extension 4-8530.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

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

Appendix A: Emission Calculations Summary
Summary After Revision

Company Name: Aerofab, Division of Tube Processing Corporation
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP Renewal No.: F097-36238-00011
Reviewer: Tamera Wessel

Uncontrolled Potential Emissions (tons/year)										
Emissions Units										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAP	Single HAP	HAP Name
Spray Paint booth/EU1	0.05	0.05	0.05	-	-	2.23	-	-	-	-
Thermal Paint Booths (EU-2)/2101	51.47	51.47	51.47	-	-	-	-	49.41	48.38	Nickel
Thermal Paint Booths (EU-3, EU-12) /2100	102.93	102.93	102.93	-	-	-	-	98.81	96.75	Nickel
Thermal Paint Booths (EU-4, EU-11) /2102	102.93	102.93	102.93	-	-	-	-	98.81	96.75	Nickel
Thermal Paint Booths (EU-13, EU-14) /2156	102.93	102.93	102.93	-	-	-	-	98.81	96.75	Nickel
Thermal Paint Booth (EU-15) /DC2	51.47	51.47	51.47	-	-	-	-	49.41	48.38	Nickel
Toluene Pretreatment/EU-5	-	-	-	-	-	2.05	-	1.94	1.94	Toluene
Titanium Etching/EU-7	-	-	-	-	5.04	-	-	-	-	-
Laser Cutting/EU-9	0.58	0.58	0.58	-	-	-	-	-	-	-
27 Gas-Fired Combustion/EU10	0.07	0.27	0.27	0.02	3.55	0.20	1.42	0.07	0.06	Hexane
Welding	0.048	0.048	0.048	-	-	-	-	0.006	0.003	Chromium
Cleanup	-	-	-	-	-	7.85	-	-	-	-
Small Parts Washers	-	-	-	-	-	0.49	-	-	-	-
Acid Cleaning Dept. ¹	-	-	-	-	-	-	-	-	-	-
Various Fabrication Processes ²	-	-	-	-	-	-	-	-	-	-
Metal Conditioning ³	-	-	-	-	-	-	-	-	-	-
Total (Non-Fugitives)	412.46	412.66	412.66	0.02	8.59	12.82	1.42	397.26	387.02	Nickel
<i>Fugitive Emissions</i>										
Paved Roads	0.86	0.17	0.04	-	-	-	-	-	-	-

Notes:

- 1) All acid cleaning activities, with the exception of the nitric acid tank for the titanium etching activity, result in no VOC or HAP emissions.
- 2) None of emission units comprising the various fabrication processes are expected to generate significant amounts of criteria or HAP pollutants.
- 3) None of the materials used in the metal conditioning operations (plating, anodizing, and hardening) contain VOCs or HAPs.

Limited Emissions (tons/year)										
Emissions Units										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAP	Single HAP	HAP Name
Spray Paint booth/EU1	0.05	0.05	0.05	-	-	2.23	-	-	-	-
Thermal Paint Booths (EU-2) /2101	27.00	10.00	10.00	-	-	-	-	2.50	0.83	Nickel
Thermal Paint Booths (EU-3, EU-12) /2100	53.92	20.00	20.00	-	-	-	-	4.99	1.66	Nickel
Thermal Paint Booths (EU-4, EU-11) /2102	53.92	20.00	20.00	-	-	-	-	4.99	1.66	Nickel
Thermal Paint Booths (EU-13, EU-14) /2156	53.92	20.00	20.00	-	-	-	-	4.99	1.66	Nickel
Thermal Paint Booth (EU-15) /DC2	53.92	20.00	20.00	-	-	-	-	4.99	1.66	Nickel
Toluene Pretreatment/EU-5	-	-	-	-	-	2.05	-	1.94	1.94	Toluene
Titanium Etching/EU-7	-	-	-	-	5.04	-	-	-	-	-
Laser Cutting/EU-9	0.58	0.58	0.58	-	-	-	-	-	-	-
27 Gas-Fired Combustion/EU10	0.07	0.27	0.27	0.02	3.55	0.20	1.42	0.09	0.06	Hexane
Welding	0.048	0.048	0.048	-	-	-	-	0.006	0.003	Chromium
Cleanup	-	-	-	-	-	7.85	-	-	-	-
Small Parts Washers	-	-	-	-	-	0.49	-	-	-	-
Acid Cleaning Dept. ¹	-	-	-	-	-	-	-	-	-	-
Various Fabrication Processes ²	-	-	-	-	-	-	-	-	-	-
Metal Conditioning ³	-	-	-	-	-	-	-	-	-	-
Total (Non-Fugitives)	243.42	90.94	90.94	0.02	8.59	12.82	1.42	24.49	<10	Nickel
<i>Fugitive Emissions</i>										
Paved Roads	0.86	0.17	0.04	-	-	-	-	-	-	-

Notes:

- 1) All acid cleaning activities, with the exception of the nitric acid tank for the titanium etching activity, result in no VOC or HAP emissions.
- 2) None of the emission units comprising the various fabrication processes are expected to generate significant amounts of criteria or HAP pollutants.
- 3) None of the materials used in the metal conditioning operations (plating, anodizing, and hardening) contain VOCs or HAPs.

**Appendix A: Emission Calculations
Spray Paint Booth**

Company Name: Aerofab, Division of Tube Processing Corporation
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP Renewal No.: F097-36238-00011
Reviewer: Tamera Wessel

Product	Maximum Capacity (unit/hr)	Application (gal/unit)	Density (lbs/gal)	Volatile Weight (%)	Non-Volatile Solids Volume (%)	Emission Rate (lbs/hr)	VOC Potential (tpy)	PM Potential (tpy)	Transfer Efficiency
Alseal 625	0.027	0.0006	13.77	60.8%	39.2%	0.0001	0.0006	0.0001	75%
Sermetel W	0.367	0.0230	13.74	63.0%	37.0%	0.0731	0.3200	0.0470	75%
Thinner IP 9151	0.395	0.1400	7.90	100.0%	0.0%	0.4369	1.9135	0.0000	75%
Total PTE:							2.23	0.047	

Methodology

Maximum Capacity (unit/hr) = calculated from maximums supplied by Permittee; 268 units per month x 12 months per year / 8,760 hours per year

Application (gal/unit) = supplied by client; based on how much product is applied to part

Density (lbs/gal) = as supplied by MSDS

Volatile Weight (%) = as supplied by MSDS

Non-Volatile Solids Volume (%) = as supplied by MSDS

Emission Rate (lbs/hr) = Maximum Capacity (unit/hr) x Application (gal/unit) x Density (lbs/gal) x Volatile Weight (%)

VOC Potential (tpy) = VOC Emissions (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

PM Potential (tpy) = Maximum Capacity (unit/hr) x Application (gal/unit) x Density (lbs/gal) x Non-Volatile Solids Volume (%) x (1 - Transfer Efficiency) x 8,760 hours per year / 2,000 lbs per ton

Appendix A: Emission Calculations
Thermal Spray Booths (EU-2, EU-3, EU-4, EU-11, EU-12, EU-13, EU-14, and EU-15)

Appendix A: Emission Calculations Summary
Company Name: Aerofab, Division of Tube Processing Corporation
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP Renewal No.: F097-36238-00011
Reviewer: Tamera Wessel

Product (Powder) Name	Max. Throughput (lbs/hr)	Transfer Efficiency of Application Equipment (%)	Material Dropout Rate* (%)	PM Emission Rate (lbs/hr)	PM Potential (tpy)	Control Efficiency (%)	Controlled PM Emission Rate (lbs/hr)	controlled PM Potential (tpy)
443NS	8.6	50%	0%	4.30	18.83	99%	0.04	0.19
AMDRY 995	23.5	50%	0%	11.75	51.47	99%	0.12	0.51
450NS	23.5	50%	0%	11.75	51.47	99%	0.12	0.51
Total for one booth (worst case)				11.75	51.47		0.12	0.51
Total for eight booths				94	411.72		0.94	4.12

Product (Powder) Name	Cobalt Content (wt%)	Chromium Content (wt%)	Manganese Content (wt%)	Nickel Content (wt%)	Cobalt Potential (tpy)	Chromium Potential (tpy)	Manganese Potential (tpy)	Nickel Potential (tpy)	Total HAPs Potential (tpy)	Controlled Cobalt Potential (tpy)	Controlled Chromium Potential (tpy)	Controlled Manganese Potential (tpy)	Controlled Nickel Potential (tpy)	Controlled Total HAPs Potential (tpy)
443NS	0.0%	18.0%	1.0%	73.0%	0.00	3.39	0.19	13.75	17.33	0.00	0.03	0.00	0.14	0.17
AMDRY 995	36.0%	29.0%	0.0%	31.0%	18.53	14.92	0.00	15.95	49.41	0.19	0.15	0.00	0.16	0.49
450NS	0.0%	0.0%	0.0%	94.0%	0.00	0.00	0.00	48.38	48.38	0.00	0.00	0.00	0.48	0.48
Worst case HAP emissions per booth					18.53	14.92	0.19	48.38	49.41	0.19	0.15	0.00	0.48	0.49
Total for eight booths					148.22	119.40	1.51	387.02	395.25	1.48	1.19	0.02	3.87	3.95

* In some cases, Material Dropout rate (30-40%) is taken into consideration when calculating thermal spray coating booths emissions. However, there is no reliable data related to Dropout rates at this source; therefore, the Dropout rate is conservatively assumed to be 0%.

Methodology

Products selected were the worst-case scenario products in terms of highest HAP concentration and throughput.

Max. Throughput (lbs/hr) = supplied by client

Transfer Efficiency of Application Equipment (%) = average used by IDEM in previous permits; % of product retained on part

Material Dropout Rate (%) = IDEM was unable to find reliable data related to Dropout rates at client and thus a conservative assumption was used;

Cornerstone did not find any data that could accurately say otherwise.

PM Emission Rate (lbs/hr) = Max. Throughput (lbs/hr) x Transfer Efficiency of Application Equipment (%) x (1 - Material Dropout Rate [%])

PM Potential (tpy) = PM Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

Controlled PM Emission Rate (lbs/hr) = Max. Throughput (lbs/hr) x Transfer Efficiency of Application Equipment (%) x (1 - Material Dropout Rate [%]) * (1 - Control Efficiency [%])

Controlled PM Potential (tpy) = controlled PM Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

[HAP] Content (wt%) = supplied by source

[HAP] Potential (tpy) = PM emission Rate (lbs/hr) x [HAP] Content (wt%) x 8,760 hours per year / 2,000 lbs per ton

[HAP] controlled Potential (tpy) = PM emission Rate (lbs/hr) x [HAP] Content (wt%) x 8,760 hours per year / 2,000 lbs per ton

PM=PM10=PM2.5

Total HAPs (tpy)	49.41	each unit before limit/control
Total HAPs (tpy)	395.25	total 8 units before limit/control
Total HAPs (tpy)	3.95	total 8 units after control

Appendix A: Emission Calculations**Toluene Pretreatment/EU-5****Company Name:** Aerofab, Division of Tube Processing Corporation**Address City IN Zip:** 604 East LeGrande, Indianapolis, IN 46203**FESOP Renewal No.:** F097-36238-00011**Reviewer:** Tamera Wessel

Product	Maximum Usage Rate (gal/hr)	Density of Turco Pretreatment (lbs/gal)	Weight % VOC	Emission Rate (lbs/hr)	VOC Potential (tpy)
Turco Pretreatment	0.07	7.44	90%	0.47	2.05

HAP	HAP Weight (%)	Emission Rate (lbs/hr)	HAP Potential (tpy)
Toluene	85.0%	0.44	1.94

Methodology

Maximum Usage Rate (gal/hr) = supplied by client

Density (lbs/gal) = as supplied by MSDS

Weight % VOC = as supplied by MSDS

VOC Emission Rate (lbs/hr) = Maximum Usage Rate (gal/hr) x Turco Pretreatment density (lbs/gal) x Weight % VOC

VOC Potential (tpy) = Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

HAP Emission Rate (lbs/hr) = Maximum Usage Rate (gal/hr) x Turco Pretreatment density (lbs/gal) x Weight % HAP

HAP Potential (tpy) = Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

**Appendix A: Emission Calculations
Titanium Etching EU-7**

Company Name: Aerofab, Division of Tube Processing Corporation
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP Renewal No.: F097-36238-00011
Reviewer: Tamera Wessel

Product	Maximum Usage (gal/yr)	Density (lbs/gal)	Solution of Nitric Acid (%)	Mole Ratio (NO ₂ /HNO ₃)	Emission Rate (lbs/yr)	NO _x Potential (tpy)
Nitric Acid	1555	12.33	72.0%	0.73	10,077.41	5.04

Methodology

Maximum Usage (gal/yr) supplied by Permittee for New Source Review and FESOP No. F097-30090-00011, issued June 6, 2011.

Density (lbs/gal) = as supplied by MSDS

Solution of Nitric Acid (%) = Maximum solution of Nitric Acid purchased by client (varies between 68 - 72%)

Mole Ratio (NO₂/HNO₃) = Ratio of Moles Nitrogen Dioxide (NO₂) to Moles Nitric Acid (HNO₃) chemically reactive

Emission Rate (lbs/yr) = Maximum Usage (gal/yr) x Density (lbs/gal) x Solution of Nitric Acid (%) x Mole Ratio (NO₂/HNO₃)

NO_x Potential (tpy) = Emission Rate (lbs/yr) / 2,000 lbs per ton

**Appendix A: Emission Calculations
Laser Cutting (EU-9)**

Appendix A: Emission Calculations Summary

Company Name: Aerofab, Division of Tube Processing Corporation
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP Renewal No.: F097-36238-00011
Reviewer: Tamera Wessel

Maximum Capacity Dust Collection (lbs/hr)	Baghouse Capture Efficiency (%)	Baghouse Control Efficiency (%)	Emission Rate Before Control (lbs/hr)	PM/PM ₁₀ /PM _{2.5} Potential (tpy)
0.131	100%	99%	0.132	0.580

Methodology

Maximum Capacity Dust Collection (lbs/hr) = calculated from the maximums supplied by source

Emission Rate Before Control (lbs/hr) = Maximum Capacity Dust Collection (lbs/hr) / (Baghouse Capture Efficiency [%] x Baghouse Control Efficiency [%])

PM Potential (tpy) = Emission Rate Before Control (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

Assumed PM=PM₁₀=PM_{2.5}

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

Company Name: Aerofab, Division of Tube Processing Corporation
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP Renewal No.: F097-36238-00011
Reviewer: Tamara Wessel

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	Unit Description
2.16	1020	18.55	Radiant Heaters, Combustion Research Corp, M/N 0600NG (9 @ 0.24 MMBtu/hr each)
1.08		9.28	Radiant Heater, Combustion Research Corp, M/N 0610NG (3 @ 0.36 MMBtu/hr each)
0.4		3.44	Radiant Heaters, Combustion Research Corp, M/N 0945NG (2 @ 0.20 MMBtu/hr each)
0.4		3.44	HVAC, Trane, M/N YCH300B4HOGA
0.4		3.44	HVAC, Trane, M/N YCH108B4HOFA
0.80		6.87	HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)
0.40		3.44	HVAC, Trane, M/N 2TXC0061AC3HCAA
0.80		6.87	HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)
0.40		3.44	HVAC, Carrier, M/N 48TJE016
0.40		3.44	HVAC, Bryant, M/N 580DPV090180ABAA
0.23		1.93	HV, Reznor, M/N EEEXL225
0.20		1.72	HV, Reznor, M/N XL200
0.20		1.72	HV, Reznor, M/N F200
0.40		3.44	HV, Dayton, M/N 3E230B
8.27			70.98

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM 2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	40
					**see below		
Potential Emission in tons/yr	0.07	0.27	0.27	0.02	3.55	0.20	1.42

*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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.453E-05	4.259E-05	2.662E-03	6.388E-02	1.207E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.775E-05	3.904E-05	4.969E-05	1.349E-05	7.453E-05

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Welding Operations**

Company Name: Aerofab, Division of Tube Processing Corporation
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP Renewal No.: F097-36238-00011
Reviewer: Tamera Wessel

Type of Welding	Type of Electrode/Consumable	Maximum Electrode Usage (lbs/hr)	Electrode Converted to Fume (%)	Emission Rate (lbs/hr)	PM/PM ₁₀ Potential (tpy)
MIG	ER70S-3	1	0.6%	0.0060	0.03
TIG	ER308LSi	1	0.5%	0.0050	0.02

TOTAL

0.05

Type of Welding	HAP	Maximum HAP in Fume (%)	Emission Rate (lbs/hr)	Potential HAP (tpy)
MIG	Manganese	7.7%	0.0005	2.02E-03
TIG	Chromium	12.5%	0.0006	2.74E-03
	Nickel	5.1%	0.0003	1.12E-03

Combined HAPs: 5.88E-03

Methodology

Type of Electrode/Consumable = Worst-Case Scenarios as supplied by the MSDS

Maximum Electrode Usage (lbs/hr) = supplied by Client; MIG/TIG stations have combined maximum capacity of 1 lbs/hr

Electrode Converted to Fume (%) = obtained from the "Guide for Estimating Welding Emissions for EPA and Ventilation Permit Reporting" published by the American Welding Society. Used Factors for ER70S-3 and ER308LSi according to MSDS

Maximum HAP in Fume (%) = obtained from the "Guide for Estimating Welding Emissions for EPA and Ventilation Permit Reporting" published by the American Welding Society. Used Factors for ER70S-3 and ER308LSi according to MSDS

Emission Rate (lbs/hr) = Maximum Electrode Usage (lbs/hr) x Electrode Converted to Fume (%) [x Maximum HAP in Fume (%)]

Potential [Pollutant] (tpy) = Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

**Appendix A: Emission Calculations
Cleanup Operations**

Company Name: Aerofab, Division of Tube Processing Corporation
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP Renewal No.: F097-36238-00011
Reviewer: Tamera Wessel

Material	Density (lbs/gal)	Maximum Usage (gal/hr)	Weight % Isopropyl Alcohol	HAP Content	Total PTE of HAPs (tons/yr)	Total PTE of VOC (tons/yr)
Isopropyl alcohol	6.56	0.27	100.00%	This solvent does not contain any HAPs	NA	7.85

Methodology:

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Usage (gal/hr) * (8,760 hr/yr) * (1 ton/2,000 lbs)

Appendix A: Emission Calculations
VOC Emissions - Small Parts Washer

Company Name: Aerofab, Division of Tube Processing Corporation
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP Renewal No.: F097-36238-00011
Reviewer: Tamera Wessel

Emission Unit	Number of Units	Max Solvent Usage per Unit (gal/year)	Solvent Density (lbs/gal)	% VOC	VOC Potential per Unit (tons/year)	Total VOC Potential (tons/year)
Small Parts Washer	2	60.00	8.2	100%	0.25	0.49

Methodology

Maximum annual solvent usage (gal/yr) = assumed that parts washer is completely empty at the end of every 6 month period; therefore= max cap (30 gal) * 2 = 60 gal/yr
 Product Density (lb/gal) = Specific Gravity (as supplied by the MSDS) * 8.34 lb/gal
 Density (lbs/gal) as supplied by the MSDS
 Volatile Content (%) = as supplied by MSDS
 VOC Potential to Emit (tpy) = Maximum annual solvent usage (gal/yr) * Solvent Density (lbs/gal) * Volatile Content (%) / 2000 lbs/ton
 Solvent used = Crystal Clean Mineral Spirits

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Aerofab, Division of Tube Processing Corporation
Source Address: 604 East LeGrande, Indianapolis, IN 46203
Permit Number: F097-36238-00011
Reviewer: Tamera Wessel

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (semi-truck)	10.0	2.0	20.0	30.0	600.0	490	0.093	1.9	677.5
Totals			20.0		600.0			1.9	677.5

Average Vehicle Weight Per Trip =

30.0	tons/trip
------	-----------

Average Miles Per Trip =

0.09	miles/trip
------	------------

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	30.0	30.0	30.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p =

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

N =

365	days per year
-----	---------------

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	2.793	0.559	0.1371	lb/mile
Mitigated Emission Factor, $E_{ext} =$	2.554	0.511	0.1254	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (semi-truck)	0.95	0.19	0.05	0.86	0.17	0.04
Totals	0.95	0.19	0.05	0.86	0.17	0.04

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

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



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

March 17, 2016

Mr. Dan Seybert
Aerofab, Division of Tube Processing Corporation
604 E LeGrande Avenue
Indianapolis, IN 46203-3907

Re: Public Notice
Aerofab, Division of Tube Processing Corporation
Permit Level: FESOP - Renewal
Permit Number: 097 - 36238 - 00011

Dear Mr. Seybert:

Enclosed is a copy of your draft FESOP - Renewal, 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 Indianapolis Star in Indianapolis, IN publish the abbreviated version of the public notice no later than March 21, 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 Indianapolis Marion Co. Pub. Lib. Garfield Branch, 2502 Shelby St. in Indianapolis IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

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

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

March 17, 2016

Indianapolis Star
Attn: Classifieds
130 S. Meridian St.
Indianapolis, Indiana 46225

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Aerofab, Division of Tube Processing Corporation, Marion County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than March 21, 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 Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: FESOP - Renewal
Permit Number: 097 - 36238 - 00011

Enclosure
PN Newspaper.dot 6/13/2013



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

March 17, 2016

To: Indianapolis Marion Co. Pub. Lib. Garfield Branch 2502 Shelby St. Indianapolis IN

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: Aerofab, Division of Tube Processing Corporation
Permit Number: 097 - 36238 - 00011

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 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

March 17, 2016

Aerofab, Division of Tube Processing Corporation

097 - 36238 - 00011

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 2/17/2016

Mail Code 61-53

IDEM Staff	LPOGOST 3/17/2016 Aero Fab Div of Tube Processing Corp. 097 - 36238 - 00011 draft/		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	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		Dan Seybert Aero_Fab Div of Tube Processing Corp. 604 E LeGrande Avenue Indianapolis IN 46203-3907 (Source CAATS)									
2		Indianapolis Marion Co. Pub. Lib. Garfield Branch 2502 Shelby St. Indianapolis IN 46203 (Library)									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
4		Indianapolis City Council and Mayors office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
6		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)									
7		Ms. Andrea Swanson-Loop Cornerstone Environmental 880 Lennox Ct Zionsville IN 46077 (Consultant)									
8		Johan & Susan Van Den Heuvel 4409 Blue Creek Drive Carmel IN 46033 (Affected Party)									
9		Indiana Members Credit Union 5103 Madison Avenue Indianapolis IN 46227 (Affected Party)									
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