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
Minor Source Operating Permit (MSOP)

for Mohler Technology, Inc. in Warrick County
MSOP Renewal No.: M173-36494-00025

The Indiana Department of Environmental Management (IDEM) has received an application from Mohler Technology, Inc. located at 2355 Eby Rd., Boonville, IN 47601 for a renewal of its MSOP issued on March 22, 2006. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Mohler Technology, Inc. to continue to operate its existing source.

This draft MSOP 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:

Warrick County Library - Boonville Branch
611 W. Main St.
Boonville, IN 47601

and

IDEM Southwest Regional Office
1120 N. Vincennes Avenue
P.O. Box 128
Petersburg, IN 47567-0128

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 M173-36494-00025 in all correspondence.

Comments should be sent to:

Adam Wheat
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-8397
Or dial directly: (317) 233-8397
Fax: (317) 232-6749 attn: Adam Wheat
E-mail: awheat@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

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

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

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

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Carol S. Comer
Commissioner

DRAFT

Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Mohler Technology, Inc.
2355 Eby Rd.
Boonville, Indiana 47601

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No. M173-36494-00025	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary jobber motor shop that manufactures and repairs electric motors.

Source Address:	2355 Eby Rd., Boonville, Indiana 47601
General Source Phone Number:	(812) 897-2900
SIC Code:	7694 (Armature Rewinding Shop), 3621 (Motors and Generators), and 5063 (Electrical Apparatus and Equipment Wiring Supplies, and Construction Materials)
County Location:	Warrick
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) pneumatic shot blasting process, identified as Process #4B, constructed in 1994, with a maximum throughput of 5,000 pounds per hour of electric motor parts and a maximum blasting rate of 1,161 pounds per hour of Type II Urea blasting media, using a cyclone control device, identified as GM9931US, to control particulate emissions, and exhausting indoors.

(b) One (1) cold cleaner type degreaser, identified as parts washer, constructed in 1995, using a manual brushing agitation method, controlling volatile organic compound (VOC) emissions by using a closed lid system.

(c) One (1) cold cleaner type degreaser (Mart cleaner), identified as Process #4C, constructed in September 1990, spraying with a turntable agitation method, equipped with a natural gas-fired heater with a maximum heat input capacity of 0.5 MMBtu/hr, and exhausting through Stacks #5A and #5B.

(d) One (1) spray booth, identified as Process #3, constructed in 1975, with a maximum capacity of 1.12 parts per hour, utilizing air atomization spray application to coat metal parts, using dry filters for particulate control, and exhausting to Vent #8.

(e) One (1) three foot impregnation dip coating system, identified as Point 10A, constructed in 1984, with a maximum throughput of 0.174 units per hour, and coating metal parts.

(f) One (1) ten foot impregnation dip coating system, identified as Point 10B, constructed in 1984, with a maximum throughput of 0.024 units per hour, and coating metal parts.

(g) One (1) natural gas-fired paint bake-off oven, identified as Process #1, constructed in 1978, with a maximum heat input capacity of 1.50 MMBtu/hr, with a burning capacity of

52 lb/hr, using an afterburner to control volatile organic compound (VOC) emissions, and exhausting through Stack #4.

(h) One (1) natural gas-fired Babbitt heating unit, identified as Process #5, constructed in 1995, comprised of four (4) individual Babbitt heaters with a combined maximum heat input capacity of 1.4 MMBtu/hr, and exhausting through Vent #7.

(i) One (1) natural gas-fired drying oven, identified as Drying Oven #1, constructed in 1984, with a maximum heat input capacity of 1.260 MMBtu/hr and exhausting through Stacks #1A and #1B.

(j) One (1) natural gas-fired drying oven, identified as Drying Oven #2, constructed in 1975, with a maximum heat input capacity of 0.5 MMBtu/hr, and exhausting through Stack #2.

(k) One (1) electric drying oven, identified as Drying Oven #3, and exhausting through Stack #3.

(l) Natural gas-fired combustion sources with heat input less than ten (10) MMBtu/hr consisting of the following:

(1) One (1) tube heater, with a maximum heat input capacity of 0.40 MMBtu/hr.
(2) One (1) tube heater, with a maximum heat input capacity of 0.04 MMBtu/hr.
(3) Three (3) tube heaters, with a maximum heat input capacity of 0.48 MMBtu/hr each.
(4) One (1) tube heater, with a maximum heat input capacity of 0.20 MMBtu/hr.
(5) One (1) tube heater, with a maximum heat input capacity of 0.64 MMBtu/hr.
(6) One (1) space heater, with a maximum heat input capacity of 0.14 MMBtu/hr.
(7) One (1) natural gas-fired water heater, constructed in 2007, with the maximum heat input capacity of 0.03 MMBtu/hr.

(m) Two (2) natural gas-fired Hotsy steam cleaners, identified as Process #4A, constructed in 2014, each with a maximum heat input capacity of 0.39 MMBtu/hr, and exhausting through Stack #6.

(n) One (1) grinding operation, identified as GR-1, constructed in 2012, and exhausting indoors.

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M173-36494-00025, 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

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

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

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

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) 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 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.

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

(a) All terms and conditions of permits established prior to M173-36494-00025 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

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

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

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

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

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.7 Stack Height [326 IAC 1-7]

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three

(3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

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

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

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) pneumatic shot blasting process, identified as Process #4B, constructed in 1994, with a maximum throughput of 5,000 pounds per hour of electric motor parts and a maximum blasting rate of 1,161 pounds per hour of Type II Urea blasting media, using a cyclone control device, identified as GM9931US, to control particulate emissions, and exhausting indoors.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the pneumatic shot blasting process (Process #4B) shall not exceed 8.71 pounds per hour when operating at a process weight rate of 6,161 pounds per hour.

The pound per hour limitation was calculated with the following equation:

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

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

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

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the cyclone for particulate control shall be in operation and control emissions from the pneumatic shot blast process at all times the pneumatic shot blast process is in operation.

Compliance Monitoring Requirements

D.1.4 Cyclone Inspections

Semiannual inspection shall be performed of the cyclone controlling the pneumatic shot blasting process.

D.1.5 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emission unit shall be shut down no later than the completion of the processing of the material in the emission unit. 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).

Re**cord Keeping and Reporting Requirement [326 IAC 2-6.1-5(a)(2)]**

D.1.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the results of the inspections required under Condition D.1.4.

(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:

(b) One (1) cold cleaner type degreaser, identified as parts washer, constructed in 1995, using a manual brushing agitation method, controlling volatile organic compound (VOC) emissions by using a closed lid system.

(c) One (1) cold cleaner type degreaser (Mart cleaner), identified as Process #4C, constructed in September 1990, spraying with a turntable agitation method, equipped with a natural gas-fired heater with a maximum heat input capacity of 0.5 MMBtu/hr, and exhausting through Stacks #5A and #5B.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

(a) 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) 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.2.2 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.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility and its 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 Requirement [326 IAC 2-6.1-5(a)(2)]

D.2.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.1, 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 D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) One (1) spray booth, identified as Process #3, constructed in 1975, with a maximum capacity of 1.12 parts per hour, utilizing air atomization spray application to coat metal parts, using dry filters for particulate control, and exhausting to Vent #8.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.3.1 Particulate Emission Limitations [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), the Permittee shall comply with the following for the spray booth (Process #3):

(a) Particulate from the Process #3 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.3.3 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.1(c), the Permittee shall maintain a record of any actions taken if overspray is visibly detected.

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(h) One (1) natural gas-fired paint bake-off oven, identified as Process #1, constructed in 1978, with a maximum heat input capacity of 1.50 MMBtu/hr, with a burning capacity of 52 lb/hr, using an afterburner to control volatile organic compound (VOC) emissions, and exhausting through Stack #4.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.4.1 Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators: Requirements), the Permittee shall comply with the following for the natural gas-fired paint bake-off oven (Process #1):

(a) The incinerator shall comply with the following requirements:

(1) Consist of primary and secondary chambers or the equivalent.

(2) Be equipped with a primary burner unless burning only wood products.

(3) Comply with 326 IAC 5-1 and 326 IAC 2.

(4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in paragraph (c) of this condition.

(5) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air.

(6) If any of the requirements of (1) through (5) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(b) A Permittee developing an operation and maintenance plan pursuant to paragraph (a)(4) of this condition must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in paragraph (a)(5) of this condition and include the following:

(A) Procedures for receiving, handling, and charging waste.

(B) Procedures for incinerator startup and shutdown.

(C) Procedures for responding to a malfunction.

(D) Procedures for maintaining proper combustion air supply levels.

(E) Procedures for operating the incinerator and associated air pollution control systems.

(F) Procedures for handling ash.

(G) A list of wastes that can be burned in the incinerator.

(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(3) The operation and maintenance plan must be readily accessible to incinerator operators.

(4) The Permittee shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(c) The Permittee shall make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	Mohler Technology, Inc.
Address:	2355 Eby Rd.
City:	Boonville, Indiana 47601
Phone #:	(812) 897-2900
MSOP #:	M173-36494-00025

I hereby certify that Mohler Technology, Inc. is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Mohler Technology, Inc. is :
- ☐ in compliance with the requirements of MSOP M173-36494-00025.
- ☐ not in compliance with the requirements of MSOP M173-36494-00025.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Mohler Technology, Inc.
Source Location:	2355 Eby Road, Boonville, Indiana 47601
County:	Warrick
SIC Code:	7694 (Armature Rewinding Shop), 3621 (Motors and Generators), and 5063 (Electrical Apparatus and Equipment Wiring Supplies, and Construction Materials)
Permit Renewal No.:	M173-36494-00025
Permit Reviewer:	Adam Wheat

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Mohler Technology, Inc. relating to the operation of a stationary jobber motor shop that manufactures and repairs electric motors. On November 16, 2015, Mohler Technology, Inc. submitted an application to the OAQ requesting to renew its operating permit. Mohler Technology, Inc. was issued its first MSOP Renewal (M173-21870-00025) on March 22, 2006.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) pneumatic shot blasting process, identified as Process #4B, constructed in 1994, with a maximum throughput of 5,000 pounds per hour of electric motor parts and a maximum blasting rate of 1,161 pounds per hour of Type II Urea blasting media, using a cyclone control device, identified as GM9931US, to control particulate emissions, and exhausting indoors.

(b) One (1) cold cleaner type degreaser, identified as parts washer, constructed in 1995, using a manual brushing agitation method, controlling volatile organic compound (VOC) emissions by using a closed lid system.

(c) One (1) cold cleaner type degreaser (Mart cleaner), identified as Process #4C, constructed in September 1990, spraying with a turntable agitation method, equipped with a natural gas-fired heater with a maximum heat input capacity of 0.5 MMBtu/hr, and exhausting through Stacks #5A and #5B.

(d) One (1) spray booth, identified as Process #3, constructed in 1975, with a maximum capacity of 1.12 parts per hour, utilizing air atomization spray application to coat metal parts, using dry filters for particulate control, and exhausting to Vent #8.

(e) One (1) three foot impregnation dip coating system, identified as Point 10A, constructed in 1984, with a maximum throughput of 0.174 units per hour, and coating metal parts.

(f) One (1) ten foot impregnation dip coating system, identified as Point 10B, constructed in 1984, with a maximum throughput of 0.024 units per hour, and coating metal parts.

(g) One (1) natural gas-fired paint bake-off oven, identified as Process #1, constructed in 1978, with a maximum heat input capacity of 1.50 MMBtu/hr, with a burning capacity of 52 lb/hr, using an afterburner to control volatile organic compound (VOC) emissions, and exhausting through Stack #4.

(h) One (1) natural gas-fired Babbitt heating unit, identified as Process #5, constructed in 1995, comprised of four (4) individual Babbitt heaters with a combined maximum heat input capacity of 1.4 MMBtu/hr, and exhausting through Vent #7.

(i) One (1) natural gas-fired drying oven, identified as Drying Oven #1, constructed in 1984, with a maximum heat input capacity of 1.260 MMBtu/hr and exhausting through Stacks #1A and #1B.

(j) One (1) natural gas-fired drying oven, identified as Drying Oven #2, constructed in 1975, with a maximum heat input capacity of 0.5 MMBtu/hr, and exhausting through Stack #2.

(k) One (1) electric drying oven, identified as Drying Oven #3, and exhausting through Stack #3.

(l) Natural gas-fired combustion sources with heat input less than ten (10) MMBtu/hr consisting of the following:

(1) One (1) tube heater, with a maximum heat input capacity of 0.40 MMBtu/hr.
(2) One (1) tube heater, with a maximum heat input capacity of 0.04 MMBtu/hr.
(3) Three (3) tube heaters, with a maximum heat input capacity of 0.48 MMBtu/hr each.
(4) One (1) tube heater, with a maximum heat input capacity of 0.20 MMBtu/hr.
(5) One (1) tube heater, with a maximum heat input capacity of 0.64 MMBtu/hr.
(6) One (1) space heater, with a maximum heat input capacity of 0.14 MMBtu/hr.
(7) One (1) natural gas-fired water heater, constructed in 2007, with the maximum heat input capacity of 0.03 MMBtu/hr.

(m) Two (2) natural gas-fired Hotsy steam cleaners, identified as Process #4A, constructed in 2014, each with a maximum heat input capacity of 0.39 MMBtu/hr, and exhausting through Stack #6.

Emission Units and Pollution Control Equipment Added to the Source

The source has added the following emission units:

(a) One (1) grinding operation, identified as GR-1, constructed in 2012, and exhausting indoors.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

(a) One (1) dip coating tank, identified as Point 9, constructed in 1975, with a maximum throughput of 9,800 units per year, coating metal parts, and exhausting through Stack #9.

Existing Approvals

Since the issuance of the MSOP 173-21870-00025 on March 22, 2006, the source has constructed or has been operating under the following additional approvals:

(a) Notice-Only Change No. 173-25456-00025 issued on November 14, 2007;

(b) Notice-Only Change No. 173-25672-00025 issued on January 28, 2008; and

(c) Notice-Only Change No. 173-27142-00025 issued on November 26, 2008.

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 Warrick County

Pollutant	Designation
SO_2	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Attainment effective October 27, 2011, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Warrick 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) $PM_{2.5}$

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

(c) Other Criteria Pollutants

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

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	tons/year
PM	54.67
PM10	54.95
PM2.5	54.95
SO2	0.31
NOx	3.92
VOC	42.88
CO	4.14
Highest Single HAP	6.70 (Xylene)
Total HAP	6.76

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 GHGs 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 all regulated pollutants are less than 100 tons per year. However, PM10, PM2.5, and VOC are equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Federal Rule Applicability

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since the surface coating operation at this source does not coat metal furniture. The source coats electric motors.

(b) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source is not located at an automobile or light-duty truck assembly plant.

(c) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (60.440 through 60.447) (326 IAC 12)

are not included in the permit, since this source does not coat pressure sensitive tape or labels. The source coats electric motors.

(d) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliance, 40 CFR 60, Subpart SS (326 IAC 12), are not included in the permit, since the surface coating operation is not located in a large appliance surface coating line. The source coats electric motors.

(e) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (60.460 through 60.466) (326 IAC 12) are not included in the permit, since this source does not coat metal coils. The source coats electric motors.

(f) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW (60.490 through 60.496) (326 IAC 12) are not included in the permit for the, since this source does not coat beverage cans. The source coats electric motors.

(g) The requirements of the New Source Performance Standard for Magnetic Tape Coating Facilities, 40 CFR 60, Subpart SSS (60.710 through 60.718) (326 IAC 12) are not included in the permit for the, since this source does not coat magnetic tape. The source coats electric motors.

(h) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliance, 40 CFR 60, Subpart SS (326 IAC 12), are not included in the permit, since this source does not coat large appliances. The source coats electric motors.

(i) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (63.460 through 63.470) (326 IAC 20-6), are not included in the permit, because the degreasing operation at this source does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a) at a concentration greater than 5% by weight.

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (4I), (326 IAC 20-85), is not included in the permit, since this source does not coat automobile or light duty truck body parts and is not a major source of HAPs. The source coats electric motors.

(l) The requirements for the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans (40 CFR 63, Subpart KKKK (63.3480 through 63.3561) (326 IAC 20-86) are not included in this permit, because this source does not engage in the coating of metal cans and is not a major source of HAP emissions. The source coats electric motors.

(m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products Surface Coating, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in the permit, since this source is not considered a major source of HAPs.

(n) The requirements for the National Emission Standards For Hazardous Air Pollutants: Surface Coating of Large Appliances 40 CFR 63, Subpart NNNN (63.4080 through 63.4181) (326 IAC 20-63) are not included in this permit because the source does not engage in the coating of large appliances. The source coats electric motors.

(o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81),

are not included in the permit for the surface coating operation, because this source is not a major source of HAPs and does not perform surface coating of plastic parts or plastic products. The source coats electric motors.

(p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included in the permit, since this source is not considered a major source of HAPs and does not coat metal furniture. The source coats electric motors.

(q) The requirements for the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil 40 CFR 63, Subpart SSSS (63.5080 through 63.5200) (326 IAC 20-64) are not included in this permit because the source does not engage in the surface coating of metal coil. The source coats electric motors.

(r) The requirements of the National Emission Standards for the Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, (326 IAC 20-95), are not included in the permit, since this source is not considered a major source of HAPs.

(s) The requirements of 40 CFR Part 63, Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources), are not included in this permit because this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, perform spray application of coatings to mobile vehicles and mobile equipment, or perform spray application of a coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrate.

(t) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (63.11193 through 63.11237), are not included for the natural gas-fired water heater or steam cleaners, because each combusts natural gas.

(u) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX (63.11514 through 63.11523), are not included in the permit, because the source is not "primarily engaged" in operations in one of the nine source categories. The term "primarily engaged" is defined under 40 CFR 63.11522 (Definitions) as follows:

Pursuant to 40 CFR 63.11522 (Definitions):

> *Primarily engaged* means the manufacturing, fabricating, or forging of one or more products listed in one of the nine metal fabrication and finishing source category descriptions in Table 1, “Description of Source Categories Affected by this Subpart,” where this production represents at least 50 percent of the production at a facility, and where production quantities are established by the volume, linear foot, square foot, or other value suited to the specific industry. The period used to determine production should be the previous continuous 12 months of operation. Facilities must document and retain their rationale for the determination that their facility is not “primarily engaged” pursuant to §63.10(b)(3) of the General Provisions.

EPA provided additional information on the definition of "primarily engaged" under 40 CFR 63.11522 (Definitions) as part of a document entitled: Nine Metal Fabrication and Finishing Area Source Categories, 40 CFR Part 63 Subpart XXXXXX (6X) NESHAP, Questions & Answers, November 2011, which is currently located on EPA's website at the following internet site: https://www3.epa.gov/ttn/atw/6x/metal_fabrication_q_a_nov-2011-rev3.pdf

As part of the document cited above, EPA indicated that in certain cases where appropriate, it may be acceptable to use revenue generation as the basis for determine which operation a source is primarily engaged in.

Based on information provided by Mohler Technology, Inc., the source operates under the following three SIC codes listed below, with the associated activity ranking based on percent of sales in 2015 corresponding to each SIC code:

SIC Code (Description)	Percent of Sales in 2015	Activity Ranking
7694 (Armature Rewinding Shop)	52%	Primary
3621 (Motors and Generators)	37%	Secondary
5063 (Electrical Apparatus and Equipment Wiring Supplies, and Construction Materials)	11%	Tertiary

While 3621 is one of the nine SIC codes covered under 40 CFR 63, Subpart XXXXXX, the source does not "primarily engage" in operations under this SIC code, as defined by 40 CFR 63.11522. In 2015, operations classified under the 3621 SIC code accounted for 37% of sales for Mohler Technology, Inc. Therefore, the source is not "primarily engaged" in operations in one of the nine source categories and is not subject to the requirements of 40 CFR 63, Subpart XXXXXX.

(v) 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.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

(a) 326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

(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 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

(d) 326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

(e) 326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

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

(g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

(h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Abrasive Blasting

(a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are applicable to the pneumatic shot blasting process, identified as Process #4B, since it has potential particulate emissions of greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2, particulate emissions from the pneumatic shot blasting process (Process #4B) shall not exceed 8.71 pounds per hour when operating a process weight rate of 6,161 pounds per hour (1,161 pounds per hour blasting rate and 5,000 pounds per hour throughput rate of electric motor parts).

The pound per hour limitation was calculated with the following equation:

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

$E = 4.10\ P^{0.67}$ where: E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

In order to comply with this requirement, the cyclone for particulate control shall be in operation at all times that the shot blasting units are in operation.

Surface Coating

(b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
(1) Pursuant to 326 IAC 6-3-1, the spray booth, identified as Process #3, is subject to the requirements of 326 IAC 6-3, since it has the potential to use equal to or greater than five (5) gallons per day of surface coatings. Pursuant to 326 IAC 6-3-2(d), the spray booth, identified as Process #3, shall use dry filters for particulate control at all times the surface coating booth is in operation. The control device shall be operated in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(i) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(ii) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so

that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(2) Pursuant to 326 IAC 6-3-1, the three (3) dip tanks (Point 9, 10A, and 10B) are not subject to the requirements of 326 IAC 6-3, since each applies surface coating utilizing dip coating.

(c) 326 IAC 8-1-6 (General Reduction Requirements)
This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emission of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

The spray booth (Process #3) and three (3) dip tanks (Point 9, 10A, and 10B) are not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC emissions of less than 25 tons per year.

(d) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Part Coating Operations)

(1) Pursuant to 326 IAC 8-2-1, the spray booth (Process #3, constructed in 1975) and the dip coating tank (Point 9, constructed in 1975) are each not subject to the requirements of 326 IAC 8-2-9, since each was constructed prior to January 1, 1980.

(2) Pursuant to 326 IAC 8-2-1, the impregnation dip tanks (Point 10A and 10B, constructed in 1984) are each not subject to the requirements of 326 IAC 8-2-9, since each unit was constructed after November 1, 1980, and before after July 1, 1990, has potential VOC emissions of less twenty-five (25) tons per year.

Degreasing

(e) 326 IAC 8-1-6 (General Reduction Requirements)
This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emission of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. The uncontrolled potential VOC emissions from the two (2) cold cleaner type degreasers (parts washer and Mart cleaner) solvent usage are less than twenty-five (25) tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply are not included in the permit.

(f) 326 IAC 8-3-2 (Cold Cleaner Operations)
Pursuant to 326 IAC 8-3-2(a)(1), the two (2) cold cleaner type degreasers (parts washer and Mart cleaner) are subject to the requirements of 326 IAC 8-3-2, since each was constructed after July 1, 1990, and performs organic solvent degreasing.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the two (2) cold cleaner type degreaser (parts washer and Mart cleaner) shall:

(1) Equip the degreaser with a cover;

(2) Equip the degreaser with a facility 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 operation 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) can evaporate into the atmosphere.

(g) 326 IAC 8-3-5 (Cold Cleaner Degreaser)
On January 30, 2013, the Indiana Environmental Control Board repealed 326 IAC 8-3-5 (Cold Cleaner Degreaser). Therefore, the source is not subject to this rule.

(h) 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)
Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure than 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).

Incinerator

(i) 326 IAC 4-2-2 (Incinerators)
The natural gas-fired paint bake-off oven (Process #1) meets the definition of an incinerator, as defined in 326 IAC 1-2-34, because it is used to remove paint from metal parts prior to recoating by means of raising the temperature of the coated substrate (metal) to the point where the coating (paint, etc.) is thermally degraded. Therefore, the requirements of 326 IAC 4-2 apply to this emission unit.

Pursuant to 326 IAC 4-2-2 (Incinerators), the Permittee shall comply with the following for the the natural gas-fired paint bake-off oven (Process #1):

(1) All incinerators shall comply with the following requirements:

(A) Consist of primary and secondary chambers or the equivalent.

(B) Be equipped with a primary burner unless burning only wood products.

(C) Comply with 326 IAC 5-1 and 326 IAC 2.

(D) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (3).

(E) Not emit particulate matter in excess of one (1) of the following:

(i) Three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.

(ii) Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.

(F) If any of the requirements of subdivisions (A) through (E) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(2) An incinerator is exempt from subsection (1)(E) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

(3) An owner or operator developing an operation and maintenance plan pursuant to subsection (1)(D) must comply with the following:

(A) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (1)(E) and include the following:

(i) Procedures for receiving, handling, and charging waste.

(ii) Procedures for incinerator startup and shutdown.

(iii) Procedures for responding to a malfunction.

(iv) Procedures for maintaining proper combustion air supply levels.

(v) Procedures for operating the incinerator and associated air pollution control systems.

(vi) Procedures for handling ash.

(vii) A list of wastes that can be burned in the incinerator.

(B) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(C) The operation and maintenance plan must be readily accessible to incinerator operators.

(D) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(4) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

(j) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The natural gas-fired paint bake-off oven (Process #1) is not subject to 326 IAC 6-2, since it is not a source of indirect heating.

(k) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired paint bake-off oven (Process #1) is not subject to the requirements of 326 IAC 6-3-2, since each has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

(l) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired paint bake-off oven (Process #1) is not subject to the requirements of 326 IAC 7-1, since it has unlimited sulfur dioxide (SO_2) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

(n) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The natural gas-fired paint bake-off oven (Process #1) is not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

(o) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The natural gas-fired paint bake-off oven (Process #1) is not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limits for the source under 326 IAC 9-1-2.

(p) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas-fired paint bake-off oven (Process #1) is not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

Drying Ovens

(q) 326 IAC 4-2-2 (Incinerators)
The natural gas-fired drying ovens (Drying Oven #1 and Drying Oven #2) are not an incinerator, as defined by 326 IAC 1-2-34, since each does not burn waste substances. Therefore, the natural gas-fired drying ovens (Drying Oven #1 and Drying Oven #2) are not subject to 326 IAC 4-2-2.

(r) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The natural gas-fired drying ovens (Drying Oven #1 and Drying Oven #2) are not subject to 326 IAC 6-2, since each is not a source of indirect heating.

(s) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired ovens (Drying Oven #1 and Drying Oven #2) are not subject to the requirements of 326 IAC 6-3-2, since each has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

(t) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired drying ovens (Drying Oven #1 and Drying Oven #2) are not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO_2) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

(u) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The natural gas-fired drying ovens (Drying Oven #1 and Drying Oven #2) are not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

(v) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The natural gas-fired drying ovens (Drying Oven #1 and Drying Oven #2) are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limits for the source under 326 IAC 9-1-2.

(w) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas-fired drying ovens (Drying Oven #1 and Drying Oven #2) are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

Natural Gas-Fired Combustion

(x) 326 IAC 6-2 (Particulate Limitations for Sources of Indirect Heating)

(1) Pursuant to 326 IAC 6-2-1(a), the seven (7) tube heaters, one (1) space heater, and one (1) Babbit heating unit (Process #5) are not subject to 326 IAC 6-2, since each is not a source of indirect heating, as defined by 326 IAC 1-2-19.

(2) The two (2) steam cleaners (Process #4A) and one (1) water heater are subject to 326 IAC 6-2, since each is a source of indirect heating that was constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4(a), particulate emissions from the steam cleaners and how water heater shall not exceed 0.6 pounds of particulate matter per million British thermal units (MMBtu) heat input since the maximum operating capacity is less than 10 MMBtu per hour, combined. The AP-42 natural gas combustion emission factor for particulate matter (PM) is 0.00186 lb/MMBtu (1.9 lb/MMCF / 1020 MMBtu/MMCF), which is less than the 326 IAC 6-2-4 PM emission limit for the two (2) steam cleaners and one

(1) water heater. Therefore, the two (2) steam cleaners and one (1) water heater are able to comply with 326 IAC 6-2-4 without the use of a control device.

(y) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired combustion steam cleaners (Process #4A), Babbit space heater (Process #5), tube heaters, space heater, and water heater at the source are each exempt from the requirements of 326 IAC 6-3, because pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

(z) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired combustion steam cleaners (Process #4A), Babbit space heater (Process #5), tube heaters, space heater, and water heater are not subject to the requirements of 326 IAC 7-1.1, since each has unlimited sulfur dioxide (SO_2) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively.

(aa) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The natural gas-fired combustion steam cleaners (Process #4A), Babbit space heater (Process #5), tube heaters, space heater, and water heater are not subject to the requirements of 326 IAC 8-1-6, since the potential unlimited VOC emissions from each unit is less than twenty-five (25) tons per year.

Grinding

(bb) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the grinding operation (GR-1) is not subject to the requirements of 326 IAC 6-3-2, since it has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Compliance Determination and Monitoring Requirements

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

Emission Unit/Control	Operating Parameters	Frequency	Range
Pneumatic Shot Blasting / Cyclone	Control Device Inspections	Semi-annually	Normal/Abnormal
Process #3 / Dry Filters	Overspray	As Needed	Overspray Detected

These semi-annual cyclone inspections requirements are necessary, because the cyclone for the pneumatic shot blasting process must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

The overspray observation requirements are necessary, because the dry filters for Process #3 must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

(b) There are no testing requirements applicable to this source.

Recommendation

The staff recommends to the Commissioner that the MSOP 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.

An application for the purposes of this review was received on November 16, 2015.

Conclusion

The operation of this stationary jobber motor shop that manufactures and repairs electric motors shall be subject to the conditions of the attached MSOP Renewal No. M173-36494-000025.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Adam Wheat 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) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.

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

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

Appendix A: Emissions Calculations
Summary of Potential Emissions

Company Name: Mohler Technology
Source Address: 2355 Eby Road, Boonville, Indiana 47601
Permit No.: M173-36494-00025
Reviewer: Adam Wheat

Uncontrolled/Unlimited Potential to Emit (tons per year)										
Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP	
Abrasive Blasting	50.8	50.8	50.8	-	-	-	-	-	-	-
Degreasing	-	-	-	-	-	23.28	-	-	-	-
Surface Coating	1.73	1.73	1.73	-	-	19.06	-	6.70	6.70	Xylene
Paint Bake-Off Oven	0.80	0.87	0.87	0.28	0.34	0.34	1.14	-	-	-
Grinding Operation	1.23	1.23	1.23	-	-	-	-	-	-	-
Natural Gas Combustion	0.07	0.27	0.27	0.02	3.58	0.20	3.00	0.07	0.06	Hexane
Total	**54.67**	**54.95**	**54.95**	**0.31**	**3.92**	**42.88**	**4.14**	**6.76**	**6.70**	**Xylene**

Appendix A: Emission Calculations
Abrasive Blasting - Confined

Company Name: **Mohler Technology**
Source Address: **2355 Eby Road, Boonville, Indiana 47601**
Permit No.: **M173-36494-00025**
Reviewer: **Adam Wheat**

Table 1 - Emission Factors for Abrasives

	Emission Factor	
Abrasive	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487
Type II Urea	34

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)
Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

	Nozzle Pressure (psig)							
Internal diameter, in	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =	2880
D = Density of abrasive (lb/ft3) From Table 2 =	34
D1 = Density of sand (lb/ft3) =	99
ID = Actual nozzle internal diameter (in) =	0.8125
ID1 = Nozzle internal diameter (in) from Table 3 =	0.75

Flow Rate (FR) (lb/hr) = **1161** per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =	0.010
FR = Flow Rate (lb/hr) =	1161
w = fraction of time of wet blasting =	0 %
N = number of nozzles =	1

Uncontrolled Emissions =	**11.61 lb/hr**
	50.84 ton/yr

METHODOLOGY
Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)
E = EF x FR x (1-w/200) x N
w should be entered in as a whole number (if w is 50%, enter 50)

Appendix A: Emission Calculations
VOC Emissions
Degreasing Operations

Company Name: Mohler Technology
Source Address: 2355 Eby Road, Boonville, Indiana 47601
Permit No.: M173-36494-00025
Reviewer: Adam Wheat

Material*	Maximum Usage (lb/day)	Usage (ton/year)	Weight % VOC (by weight)	Potential VOC (ton/year)
C+H Spray DET RS	1476.00	269.37	5.00%	13.47
C+H Defoamer	6.48	1.18	0.00%	0.00
Stoddard Solvent (Mineral Spirits)	53.76	9.81	100.00%	9.81
			Total:	**23.28**

METHODOLOGY

*PTE is based on the total usuage of these materials, since both C+H solvents are used in the Mart process and Stoddard Solvent is used in a separate process. These materials contain no or negligible amounts of hazardous air pollutants (HAPs).

Maximum Usage (tons/year) = Maximum Usage (lb/day) * (ton/2000 lbs) * (365 days/year)

Potential VOC (tons/yr) = Maximum Usage (tons/year) * Weight % VOC

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Mohler Technology
Source Address: 2355 Eby Road, Boonville, Indiana 47601
Permit No.: M173-36494-00025
Reviewer: Adam Wheat

Process #3 PTE

Material*	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Throughput (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency**
Coating 991308	8.72	85.00%	0.0%	85.0%	0.0%	21.94%	0.250	1.120	6.720	7.41	7.41	2.08	49.81	9.09	1.20	33.78	25%
Coating 993919	7.48	74.80%	0.0%	74.8%	0.0%	14.05%	0.250	1.120	6.720	5.60	5.60	1.57	37.60	6.86	1.73	39.82	25%
											PTE of Worst Case Coating:	**2.08**	**49.81**	**9.09**	**1.73**		

Dip Coating PTE

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)***	Maximum Throughput (unit/hour)***	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Point 10A - Epoxolite 478	9.70	30.00%	0.0%	30.0%	0.0%	70.00%	3.608	0.174	15.061	2.91	2.91	1.83	43.83	8.00	0.00	0.00	100%
Point 10B - Epoxolite 477	9.70	5.00%	0.0%	5.0%	0.0%	95.00%	38.144	0.024	22.328	0.49	0.49	0.45	10.83	1.98	0.00	0.00	100%
											Total:	**2.28**	**54.66**	**9.97**	**0.00**		

*These coatings are mutually exclusive (only one coating can be applied at a time). Therefore the worst case coating is used to determing the PTE.
**Process #3 transfer efficiency based on air atomization spray application.
***The Gal of Mat. (gal/unit) and Maximum Throughput (unit/hour) represent a worst case scenario that was calculated using the tables below.

METHODOLOGY:
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Point 10A Actual Usage - Epoxy 477 (10 foot impregnation tank)

	hrs/unit *	lbs/unit*	lbs/hr	gallons/unit
Unit 1	11.25	30	2.667	3.093
Unit 2	12.75	45	3.529	4.639
Unit 3	14.5	75	5.172	7.732
Unit 4	18.75	95	5.067	9.794
Unit 5	41	370	9.024	38.144

*information provided by the source.

Point 10B Actual Usage - Epoxy 478 (3 foot impregnation tank)

	hrs/unit*	lbs/unit*	lbs/hr	gallons/unit
Unit 1	4.25	4.5	1.059	0.464
Unit 2	4.25	7	1.647	0.722
Unit 3	5.75	35	6.087	3.608

Appendix A: Emission Calculations
Hazardous Air Pollutant (HAP) Emissions
From Surface Coating Operations

Company Name: **Mohler Technology**
Source Address: **2355 Eby Road, Boonville, Indiana 47601**
Permit No.: **M173-36494-00025**
Reviewer: **Adam Wheat**

Process #3

Material*	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	PTE of Xylene (ton/yr)
Coating 991308	8.72	0.250	1.12	35.00%	3.74
Coating 993919	7.48	0.250	1.12	73.00%	6.70
				Worst Case PTE of Each Single HAP (ton/yr)	**6.70**
				Worst Case PTE of Total HAPs (ton/yr)	**6.70**

METHODOLOGY

*These coatings are mutually exclusive (only one coating can be applied at a time). Therefore the worst case coating is used to determing the PTE
HAP emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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Appendix A: Emission Calculations
Grinding Emissions

Company Name: Mohler Technology
Source Address: 2355 Eby Road, Boonville, Indiana 47601
Permit No.: M173-36494-00025
Reviewer: Adam Wheat

Amount of Epoxy Removed from Each Unit* (lbs/unit)	Maximum Throughput* (units/hr)	PTE of PM/PM10/PM2.5 (lbs/hr)	PTE of PM/PM10/PM2.5 (tons/yr)
0.25	1.13	0.28	1.23

*Information provided by the source

METHODOLOGY

PTE of PM/PM10/PM2.5 (lbs/hr) = Amount of Epoxy Removed from Each Unit (lbs/unit) * Maximum Throughput (units/hr)
PTE of PM/PM10/PM2.5 (tons/yr) = PTE of PM/PM10/PM2.5 (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)

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

Company Name: **Mohler Technology**
Source Address: **2355 Eby Road, Boonville, Indiana 47601**
Permit No.: **M173-36494-00025**
Reviewer: **Adam Wheat**

	Heat Input Capacity MMBtu/hr
One (1) paint bake-off oven @ 1.5 MMBtu/hr (ID#: Process #1)	1.50
One (1) Babbitt heating unit @ 1.4 MMBtu/hr (ID#: Process #5)	1.40
One (1) drying oven @ 1.260 MMBtu/hr (ID#: Drying Oven #1)	1.26
One (1) drying oven @ 0.50 MMBtu/hr (ID#: Drying Oven #2)	0.50
One (1) tube heater @ 0.40 MMBtu/hr	0.40
One (1) tube heater @ 0.04 MMBtu/hr	0.04
Three (3) tube heaters @ 0.48 MMBtu/hr, each	1.44
One (1) tube heater @ 0.20 MMBtu/hr	0.20
One (1) tube heater @ 0.64 MMBtu/hr	0.64
One (1) space heater @ 0.14 MMBtu/hr	0.14
One (1) water heater @ 0.03 MMBtu/hr	0.03
Two (2) steam cleaners @ 0.39 MMBtu/hr each (ID#: Process #4A)	0.78
Total	**8.33**

HHV
mmBtu
mmscf
1020

Potential Throughput
MMCF/yr
71.5

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.07	0.27	0.27	0.02	3.58	0.20	3.00

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	7.5E-05	4.3E-05	2.7E-03	0.06	1.2E-04	**0.07**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.8E-05	3.9E-05	5.0E-05	1.4E-05	7.5E-05	**2.0E-04**

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

Total HAPs	**0.07**
Worst HAP	**0.06**

Appendix A: Emissions Calculations
Paint Bake-Off Oven

Company Name: Mohler Technology
Source Address: 2355 Eby Road, Boonville, Indiana 47601
Permit No.: M173-36494-00025
Reviewer: Adam Wheat

Potential Throughput lbs/hr	Potential Throughput ton/yr
52	227.76

	Pollutant						
	PM	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/ton	7.0	7.6	7.6	2.5	3.0	3.0	10.0
Potential Emissions in ton/	0.8	0.9	0.9	0.3	0.3	0.3	1.1

Methodology
Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers
*There are no PM10 and PM2.5 emission factors (PM10 and PM2.5 emission assumed equal to PM emissions)
Potential Throughput (tons/yr) = [Potential Throughput (lbs/hr)] * [8,760 hrs/yr] * [ton/2000 lbs]
Potential to Emit (tons/yr) = [Potential Throughput (tons/yr)] * [Emission Factor (lb/ton)] * [ton/2,000 lbs]

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: **Mohler Technology**
Source Address: **2355 Eby Road, Boonville, Indiana 47601**
Permit No.: **M173-36494-00025**
Reviewer: **Adam Wheat**

Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	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)
Semi-Tractor (entering)	1.0	0.3	0.3	16.0	4.5	500	0.095	0.0	9.7
Semi-Tractor (Leaving)	1.0	0.3	0.3	35.0	9.8	500	0.095	0.0	9.7
Freight Truck (20' bed) (entering)	1.0	0.3	0.3	26.0	7.8	500	0.095	0.0	10.4
Freight Truck (20' bed) (leaving)	1.0	0.3	0.3	15.0	4.5	500	0.095	0.0	10.4
Moving Truck (14' bed) (entering)	2.0	0.5	1.0	16.5	16.5	500	0.095	0.1	34.6
Moving Truck (14' bed) (leaving)	2.0	0.5	1.0	11.5	11.5	500	0.095	0.1	34.6
Moving Truck (12' bed) (entering)	1.0	0.5	0.5	9.8	4.4	500	0.095	0.0	15.6
Moving Truck (12' bed) (leaving)	1.0	0.5	0.5	6.0	2.7	500	0.095	0.0	15.6
Pick-up Truck (entering)	6.0	2.9	17.2	6.0	103.0	500	0.095	1.6	593.1
Pick-up Truck (leaving)	6.0	2.9	17.2	3.0	51.5	500	0.095	1.6	593.1
		Totals	**38.4**		**216.1**			**3.6**	**1326.6**

Average Vehicle Weight Per Trip = 5.6 tons/trip
Average Miles Per Trip = 0.09 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.0	6.0	6.0	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	5.6	5.6	5.6	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	4.00	1.07	0.11	lb/mile
Mitigated Emission Factor, Eext =	2.63	0.70	0.07	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)
Semi-Tractor (entering)	0.02	0.01	0.00	0.01	0.00	0.00
Semi-Tractor (Leaving)	0.02	0.01	0.00	0.01	0.00	0.00
Freight Truck (20' bed) (entering)	0.02	0.01	0.00	0.01	0.00	0.00
Freight Truck (20' bed) (leaving)	0.02	0.01	0.00	0.01	0.00	0.00
Moving Truck (14' bed) (entering)	0.07	0.02	0.00	0.05	0.01	0.00
Moving Truck (14' bed) (leaving)	0.07	0.02	0.00	0.05	0.01	0.00
Moving Truck (12' bed) (entering)	0.03	0.01	0.00	0.02	0.01	0.00
Moving Truck (12' bed) (leaving)	0.03	0.01	0.00	0.02	0.01	0.00
Pick-up Truck (entering)	1.19	0.32	0.03	0.78	0.21	0.02
Pick-up Truck (leaving)	1.19	0.32	0.03	0.78	0.21	0.02
Totals	**2.66**	**0.71**	**0.07**	**1.75**	**0.47**	**0.05**

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

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

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

April 20, 2016

Mr. Larry W. Ellerbrook
Mohler Technology, Inc.
P. O. Box 669
Boonville, Indiana 47601-0669

Re: Public Notice
Mohler Technology, Inc.
Permit Level: MSOP- Renewal
Permit Number: 173-36494-00025

Dear Mr. Ellerbrook:

Enclosed is a copy of your draft MSOP - 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 Boonville Standard in Boonville, Indiana publish the abbreviated version of the public notice no later than April 28, 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 Boonville – Warrick County Public Library, 611 W. Main Street in Boonville, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Adam Wheat, 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 3-8397 or dial (317) 233-8397.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

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

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

April 19, 2016

Boonville Standard
P. O. Box 71
Boonville, Indiana 47601

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Mohler Technology, Inc., Warrick 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 April 28, 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 Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: MSOP - Renewal
Permit Number: 173-36494-00025

Enclosure

PN Newspaper.dot 2/17/2016

Indiana Department of Environmental Management
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

April 20, 2016

To: Boonville – Warrick County Public Library

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

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

Applicant Name: Mohler Technology, Inc.
Permit Number: 173-36494-00025

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

Indiana Department of Environmental Management
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

April 20, 2016
Mohler Technology, Inc.
173-36494-00025

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	VBIDDLE 4/19/2016 Mohler Technology, Inc. 173-36494-00025 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		Larry W Ellerbrook Mohler Technology, Inc. PO Box 669 Boonville IN 47601-0669 (Source CAATS)									
2		Warrick County Board of Commissioners 107 W. Locust Street Suite # 301 Boonville IN 47601-0585 *(Local Official)*									
3		Boonville Town Council P.O. Box 585 Boonville IN 47601 *(Local Official)*									
4		Boonville Warrick Co Public Library 611 W Main Boonville IN 47601-1544 *(Library)*									
5		Warrick County Health Department 107 W Locust, Suite 204 Boonville IN 47601-1701 *(Health Department)*									
6		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 *(Affected Party)*									
7		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 *(Affected Party)*									
8		Mr. Bil Musgrove PO Box 520 Chandler IN 47610 *(Affected Party)*									
9		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 *(Affected Party)*									
10		John Blair 800 Adams Ave Evansville IN 47713 *(Affected Party)*									
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