



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

To: Interested Parties

Date: March 24, 2016

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

Source Name: Galfab Acquisition, LLC

Permit Level: MSOP - Administrative Amendment

Permit Number: 131 - 36912 - 00018

Source Location: 612 W. 11th Street, Winamac, Indiana

Type of Action Taken: Changes that are administrative in nature

## **Notice of Decision: Approval**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 36912.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

*(continues on next page)*

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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



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Mr. Bill Geise  
Galfab Acquisition, LLC  
612 W 11th Street  
Winamac, IN 46996

March 24, 2016

Re: 131-36912-00018  
Administrative Amendment to  
M131-31279-00018

Dear Mr. Geise:

Galfab Acquisition LLC was issued a Minor Source Operating Permit (MSOP) No. M131-31279-00018 on May 9, 2012 for a stationary metal waste container manufacturing plant located at 612 W. 11th Street, Winamac, IN 46996. On March 7, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to construct and operate five (5) additional MIG welders.

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add emissions units, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the applicant.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire MSOP as amended.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Vasantha Palakurti of my staff at 317-234-9694 or 1-800-451-6027, and ask for extension 4-9694.

Sincerely,

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

Attachments: Updated Permit, Technical Support Document, and Appendix A

TS/PV

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



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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Galfab Acquisition, LLC  
612 W. 11th Street  
Winamac, Indiana 46996**

(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.: M131-31279-00018	
Issued by: Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 9, 2012  Expiration Date: May 9, 2022

First Administrative Amendment No.: M131-32730-00018

Second Administrative Amendment No.: M131-36912-00018	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date:  March 24, 2016  Expiration Date: May 9, 2022

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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)]

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The Permittee owns and operates a stationary metal waste container manufacturing plant.

Source Address:	612 W. 11th Street, Winamac, Indiana 46996
General Source Phone Number:	574-946-7767
SIC Code:	3444 (Sheet Metal Work)
County Location:	Pulaski
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD 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

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

- (a) Painting operations (identified as EU-01) located at North, Middle and South Paint Rooms, constructed in 1992, with a combined total maximum throughput rate of 0.45 metal waste containers per hour using all three rooms, consisting of the following:
  - (1) Three (3) airless spray guns, with a total maximum primer usage of 2.0 gallons per metal waste container and maximum paint usage of 4.0 gallons per metal waste container, using dry filters for overspray control, and exhausting at stacks S1 and S2.
  - (2) One (1) clean-up process for the paint guns and tools, with a maximum clean-up usage of 0.8 gallons per metal waste container.
  - (3) One (1) caustic metal wash process to remove rust and oil from the containers prior to painting, with a maximum caustic detergent usage of 1.40 gallons per metal waste container, with no VOC emissions.
  - (4) One (1) metal preparation process to remove oil from the metal prior to painting, with a maximum solvent usage equal to 0.32 gallons per metal waste container.
- (b) One (1) touch-up spray painting process using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour. The touch-up spray painting is performed at the North, Middle and South Paint Rooms, listed under painting operation (EU-01) and adjoining drying areas.
- (c) Degreasing operations, constructed in 1992 that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.

- (d) One (1) steel machining process, including shearing, pressing and punching of cold steel, constructed in 1992, with a maximum throughput rate of 4,000 pounds of steel per hour, and exhausting into the building. The machining utilizes an aqueous coolant to continuously flood the machining interface.
- (e) Welding and cutting operations, exhausting inside the building and consisting of the following:
  - (1) Forty-six (46) MIG welding stations, constructed in 1992, each with a maximum wire consumption rate of 1.50 pounds per hour. [326 IAC 6-3-2]
  - (2) Five (5) MIG welding stations, constructed in 2106, each with a maximum wire consumption rate of 1.50 pounds per hour. [326 IAC 6-3-2]
  - (3) Two (2) stick welding stations, constructed in 1992, each with a maximum electrode consumption rate of 1.80 pounds per hour.
  - (4) One (1) TIG welding station, constructed in 1992, with a maximum wire consumption rate of 2.0 pounds per hour.
  - (5) Fifteen (15) oxyacetylene cutters, constructed in 1992 each with a maximum cutting rate of 20 inches per minute and the maximum thickness of the metal is 0.25 inches.
  - (6) One (1) oxypropylene cutter, constructed in 1992 with a maximum cutting rate of 40 inches per minute and the maximum thickness of the metal is 2.0 inches.
- (f) Natural gas-fired space heaters and make-up air heaters, constructed in 1992, with a combined maximum total heat input of 5.40 MMBtu per hour.
- (g) A petroleum fuel, other than gasoline dispensing, constructed in 1992, facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (h) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

## **SECTION B GENERAL CONDITIONS**

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

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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, M131-31279-00018, 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]**

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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**

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

### **B.5 Severability**

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

### **B.6 Property Rights or Exclusive Privilege**

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

### **B.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)]**

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- (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]**

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- (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]**

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- (a) All terms and conditions of permits established prior to M131-31279-00018 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)]**

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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]**

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- (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]**

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- (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**

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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]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

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

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- (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]**

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- (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]**

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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]**

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

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- (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.8 Performance Testing [326 IAC 3-6]**

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

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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.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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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.11 Instrument Specifications [326 IAC 2-1.1-11]**

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- (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.12 Response to Excursions or Exceedances**

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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.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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.14 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.15 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.16 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) Painting operations (identified as EU-01) located at North, Middle and South Paint Rooms, constructed in 1992, with a combined total maximum throughput rate of 0.45 metal waste containers per hour using all three rooms, consisting of the following:
- (1) Three (3) airless spray guns, with a total maximum primer usage of 2.0 gallons per metal waste container and maximum paint usage of 4.0 gallons per metal waste container, using dry filters for overspray control, and exhausting at stacks S1 and S2.
  - (2) One (1) clean-up process for the paint guns and tools, with a maximum clean-up usage of 0.8 gallons per metal waste container.
  - (3) One (1) caustic metal wash process to remove rust and oil from the containers prior to painting, with a maximum caustic detergent usage of 1.40 gallons per metal waste container, with no VOC emissions.
  - (4) One (1) metal preparation process to remove oil from the metal prior to painting, with a maximum solvent usage equal to 0.32 gallons per metal waste container.
- (b) One (1) touch-up spray painting process using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour. The touch-up spray painting is performed at the North, Middle, and South Paint Rooms, listed under painting operation (EU-01) and adjoining drying areas.

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

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

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

- (a) Pursuant to 326 IAC 8-2-9, for painting operations (identified as EU-01), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating excluding water, as delivered to the applicator for extreme performance coatings.
- (b) The touch-up spray painting process (identified as 1A-1) shall be limited to less than fifteen (15) pounds per day of VOC each, including coatings, dilution solvents, and cleaning solvents, when coating metal substrates. This usage limit shall render the requirements 326 IAC 8-2-9 not applicable.

#### D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

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

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

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

#### D.1.3 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the painting operations (identified as EU-01) 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.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

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

Compliance with the VOC content contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain

records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used, less water.
  - (2) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (b) To document the compliance status with Condition D.1.1(b) the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC daily usage limits established in Condition D.1.1(b).
- (1) The VOC usage of each coating material and solvent used for each day when coating metal substrates.
  - (2) A log of the dates of use.
  - (3) The amount and content of coating material and solvent less water used when coating metal substrates for each day.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (4) The metal substrate coating cleanup solvent usage for each day.
  - (5) The total weight of VOC emitted for each day from coating metal substrates.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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#### D.1.7 Reporting Requirements

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A quarterly summary of the information to document the compliance status with Condition D.1.1(b) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-6.1-5 by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (c) Degreasing operations, constructed in 1992 that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.

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

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980:

- (a) The permittee shall ensure the following control equipment and operating requirements are met:
- (1) Equip the cleaner with a cover;
  - (2) Equip the cleaner with a facility for draining cleaned parts;
  - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) Provide a permanent, conspicuous label summarizing the operation requirements;
  - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) The owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.

- (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure 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]**

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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]**

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A Preventive Maintenance Plan is required for cold cleaning degreaser 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**

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- (a) To document the compliance status with Condition D.2.2, 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 [326 IAC 2-6.1-5(a)(1)]:

- (d) One (1) steel machining shaping process, including shearing, pressing and punching of cold steel, constructed in 1992, with a maximum throughput rate of 4,000 pounds of steel per hour, and exhausting into the building. The machining utilizes an aqueous coolant to continuously flood the machining interface.
- (e) Welding and cutting operations, exhausting inside the building and consisting of the following:
  - (1) Forty-six (46) MIG welding stations, constructed in 1992, each with a maximum wire consumption rate of 1.50 pounds per hour.
  - (2) Two (2) stick welding stations, each with a maximum electrode consumption rate of 1.80 pounds per hour.
  - (3) One (1) TIG welding station, with a maximum wire consumption rate of 2.0 pounds per hour.
  - (4) Fifteen (15) oxyacetylene cutters, each with a maximum cutting rate of 20 inches per minute and the maximum thickness of the metal is 0.25 inches.
  - (5) One (1) oxypropylene cutter, with a maximum cutting rate of 40 inches per minute and the maximum thickness of the metal is 2.0 inches.

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

### Emission Limitations and Standards

#### D.3.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the steel shaping process shall not exceed 6.25 pounds per hour, when operating at a process weight rate of 4,000 pounds per hour.

The pounds 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:

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from welding and cutting operations shall not exceed 6.53 pounds per hour, when operating at a process weight rate of 4,005.30 pounds per hour.

The pounds 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

**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).

<b>Company Name:</b>	Galfab Acquisition, LLC
<b>Address:</b>	612 W. 11th Street
<b>City:</b>	Winamac, Indiana 46996
<b>Phone #:</b>	574-946-7767
<b>MSOP #:</b>	M131-31279-00018

I hereby certify that Galfab Acquisition, LLC is:

still in operation.

no longer in operation.

I hereby certify that Galfab Acquisition, LLC is:

in compliance with the requirements of MSOP M131-31279-00018.

not in compliance with the requirements of MSOP M131-31279-00018.

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

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

<b>Noncompliance:</b>

### 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:

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**Office of Air Quality**  
**Compliance and Enforcement Branch,**  
**FESOP Quarterly Report**

**Source Name:** Galfab Acquisition, LLC  
**Source Address:** 612 W. 11th Street, Winamac, Indiana 46996  
**MSOP Permit No.:** M 131-31279-00018  
**Facility:** Touch-up spray paint operation (1A-1)  
**Parameter:** VOC  
**Limit:** less than fifteen (15) lbs per day of VOC each, including coatings, dilution solvents and cleaning solvents, when coating metal substrates.

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

Technical Support Document (TSD) for an Administrative Amendment to a  
Minor Source Operating Permit (MSOP)

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>Galfab Acquisition LLC</b>
<b>Source Location:</b>	<b>612 W 11th Street, Winamac, IN 46996</b>
<b>County:</b>	<b>Pulaski</b>
<b>SIC Code:</b>	<b>3444 (Sheet Metal Work)</b>
<b>Operation Permit No.:</b>	<b>131-31279-00018</b>
<b>Operation Permit Issuance Date:</b>	<b>May 09, 2012</b>
<b>Administrative Amendment No.:</b>	<b>131-36912-00018</b>
<b>Permit Reviewer:</b>	<b>Vasantha Palakurti</b>

On March 03, 2016, the Office of Air Quality (OAQ) received an application from Galfab Acquisition LLC related to a modification to an existing stationary metal waste container manufacturing plant.

<b>Existing Approvals</b>
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The source was issued Minor Source Operating Permit Renewal No. M131-31279-00018 on May 09, 2012. The source has since received the following approvals:

- (a) Administrative Amendment No. 131-32730-00018, issued on January 18, 2013

<b>County Attainment Status</b>
---------------------------------

The source is located in Pulaski County

Pollutant	Designation
SO2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM2.5	Unclassifiable or attainment effective April 5, 2005, for the annual PM2.5 standard.
PM2.5	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM2.5 standard.
PM10	Unclassifiable effective November 15, 1990.
NO2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> 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<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Pulaski County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.



negl. = negligible

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

\*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

### Description of Proposed Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Galfab Acquisition LLC on March 7, 2016, relating to construction and operation of five (5) MIG welding stations.

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

- (e) Welding and cutting operations identified as (IA-03), constructed in 1992, exhausting inside the building and consisting of the following:
  - (1) Five (5) MIG welding stations, each with a maximum wire consumption rate of 1.50 pounds per hour.

\*\*\*

### Enforcement Issues

There are no pending enforcement actions related to this amendment.

### Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

### Permit Level Determination – MSOP Amendment

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed amendment. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Proposed Administrative Amendment (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Welding/Cutting (IA-03)	<b>0.18</b>	0.18	0.18	0.00	0.00	0.00	0.00	0.02	0.02 Manganese
<b>Total PTE of Proposed Amendment</b>	<b>0.18</b>	<b>0.18</b>	<b>0.18</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.02</b>	<b>0.02</b>

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add emissions units, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the applicant.

**PTE of the Entire Source After Issuance of the MSOP Amendment**

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Administrative Amendment (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Primers (EU-01)	5.82	5.82	5.82	0.00	0.00	4.42	0.00	2.08	2.08 Triethylamine
Paints (EU-01)	8.80	8.80	8.80	0.00	0.00	12.45	0.00	1.03	1.03 Glycol Ethers
Clean-up (EU-01)	0.13	0.13	0.13	0.00	0.00	4.68	0.00	1.16	0.82 Toluene
Metal Prep (EU-01)	0.00	0.00	0.00	0.00	0.00	3.93	0.00	0.00	
Touch-up Spray Paints (IA-01)	0.13	0.13	0.13	0.00	0.00	3.00	0.00	0.99	0.99 Toluene
Natural Gas Combustion - Space Heaters	0.04	0.18	0.18	0.01	2.37	0.13	1.99	0.04	0.04 Hexane
Welding/Cutting (IA-03)	<b>8.84</b> <del>8.65</del>	<b>8.84</b> <del>8.65</del>	<b>8.84</b> <del>8.65</del>	0.00	0.00	0.00	0.00	<b>0.22</b> <del>0.21</del>	0.19 Manganese
<b>Total PTE of Entire Source</b>	<b>23.75</b> <del>23.56</del>	<b>23.89</b> <del>23.69</del>	<b>23.89</b> <del>23.69</del>	<b>0.01</b>	<b>2.37</b>	<b>28.60</b>	<b>1.99</b>	<b>5.53</b> <del>5.51</del>	2.08 Triethylamine
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source after issuance of this revision. The table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Administrative Amendment (tons/year) (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Primers (EU-01)	5.82	5.82	5.82	0.00	0.00	4.42	0.00	2.08	2.08 Triethylamine
Paints (EU-01)	8.80	8.80	8.80	0.00	0.00	12.45	0.00	1.03	1.03 Glycol Ethers
Clean-up (EU-01)	0.13	0.13	0.13	0.00	0.00	4.68	0.00	1.16	0.82 Toluene
Metal Prep (EU-01)	0.00	0.00	0.00	0.00	0.00	3.93	0.00	0.00	
Touch-up Spray Paints (IA-01)	0.13	0.13	0.13	0.00	0.00	3.00	0.00	0.99	0.99 Toluene
Natural Gas Combustion - Space Heaters	0.04	0.18	0.18	0.01	2.37	0.13	1.99	0.04	0.04 Hexane
Welding/Cutting (IA-03)	8.84	8.84	8.84	0.00	0.00	0.00	0.00	0.22	0.19 Manganese
<b>Total PTE of Entire Source</b>	<b>23.75</b>	<b>23.89</b>	<b>23.89</b>	<b>0.01</b>	<b>2.37</b>	<b>28.60</b>	<b>1.99</b>	<b>5.53</b>	2.08 Triethylamine
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

MSOP Status

- (1) **Criteria Pollutants**  
 This amendment to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit regulated pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
  
- (2) **HAPs**  
 This amendment will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

### Permit Level Determination – PSD

- (a) **PSD Minor Source – PM**  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) **PSD Minor Source – Other Regulated Pollutants**  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Amendment Section above or Appendix A.

### Federal Rule Applicability Determination

- (a) **New Source Performance Standards (NSPS)**  
There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed amendment.
- (b) **National Emission Standards for Hazardous Air Pollutants (NESHAP)**
- (1) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit because the source's SIC code (3714) is not included in the EPA source category list for the nine metal fabrication and finishing source categories. Although the source engages in making metal containers, it does not qualify as one of the nine source categories.
- (2) There are no other National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed amendment.
- (c) **Compliance Assurance Monitoring (CAM)**  
Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

### State Rule Applicability Determination

#### **326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

#### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

See PTE of the Entire Source After Issuance of the MSOP Amendment Section above.

#### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

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

#### **326 IAC 12 (New Source Performance Standards)**

See Federal Rule Applicability Section of this TSD.

#### **326 IAC 20 (Hazardous Air Pollutants)**

See Federal Rule Applicability Section of this TSD.

**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.

**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.

**State Rule Applicability – 5 New Welders**

**326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-1, The each of the five welding units are not subject to 6-3 rule because each welding unit consumes less than 625 pounds of welding rod each day..

**Compliance Determination, Monitoring and Testing Requirements**

The existing compliance requirements will not change as a result of this amendment. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP Renewal No: M131-31279-00018, issued on May 9, 2012 with its most recent revisions and amendments.

**Proposed Changes**

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

Section A - Revisions

IDEM, OAQ has revised Condition A.2 to incorporate new equipment described in this administrative amendment.

Section A has been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) ...
- (e) Welding and cutting operations, ~~constructed in 1992~~, exhausting inside the building and consisting of the following:
  - (1) Forty-six (46) MIG welding stations, **constructed in 1992**, each with a maximum wire consumption rate of 1.50 pounds per hour.
  - (2) **Five (5) MIG welding stations, constructed in 2016, each with a maximum wire consumption rate of 1.50 pounds per hour.**

\*\*\*

Section C - Revisions

IDEM, OAQ has made changes to some of the standard language in C conditions of the permit to help clarify the intent of these conditions. The following revisions have been made to the C Section of the permit to match the current model language and to add applicable requirements:

**Section C has been revised as follows:**

IDEM, OAQ has removed Section C Fugitive Particulate Matter Emission to match the current model language

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

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

~~C.8C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

~~\*\*\*~~

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

.....

IDEM has clarified Section C Instrument Specifications:

~~C.12C.11 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.**~~

~~\*\*\*~~

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**Section D - Revisions**

IDEM, OAQ has made changes to some of the standard language in conditions in the D Sections of the permit to help clarify the intent of these conditions. The following revisions have been made to the D Sections of the permit:

IDEM, OAQ has revised Section D to match the current model language and to add applicable requirements.

Section D.2 has been revised as rule [326IAC 8-3-5] has been repealed and a new rule [326 IAC 8-3-2] has been added.

~~D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]~~

- ~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:~~

- ~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~

- ~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred (100) degrees Fahrenheit (100°F));~~

- ~~(B) The solvent is agitated; or~~

- ~~(C) The solvent is heated.~~

- ~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~
- ~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~
- ~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~
- ~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (33°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):~~
  - ~~(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~
  - ~~(B) A water cover when solvent is used is insoluble in, and heavier than, water.~~
  - ~~(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~
- ~~(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:~~
  - ~~(1) Close the cover whenever articles are not being handled in the degreaser.~~
  - ~~(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~
  - ~~(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

#### **D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]**

**Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980:**

- (a) The permittee shall ensure the following control equipment and operating requirements are met:**
  - ...**
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.**

- (b) The owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
  - (2) Ensure 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]**

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A Preventive Maintenance Plan is required for cold cleaning degreaser 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**

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- (a) To document the compliance status with Condition D.2.2, 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 has been revised as follows:

#### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) ...
- (e) Welding and cutting operations, ~~constructed in 1992~~, exhausting inside the building and consisting of the following:
  - (1) Forty-six (46) MIG welding stations, **constructed in 1992**, each with a maximum wire consumptions rate of 1.50 pounds per hour

\*\*\*

#### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 7, 2016.

#### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Vasantha Palakurti at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-9694 or toll free at 1-800-451-6027 extension 4-9694.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations  
SUMMARY**

**Company Name:** Galfab Acquisition, LLC  
**Address City IN Zip:** 612 West 11th St., Winamac, IN 46996  
**Permit Number:** 131-36912-00018  
**Reviewer:** Vasantha Palakurti

Uncontrolled Potential to Emit of Modification Tons per year										
Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAPs	
5 Welding Units	0.18	0.18	0.18	0.00	0.00	0.00	0.00	0.02	0.02	Manganese
<b>Total</b>	<b>0.18</b>	<b>0.18</b>	<b>0.18</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.02</b>	<b>0.02</b>	<b>Manganese</b>

Uncontrolled POTENTIAL TO EMIT IN TONS PER YEAR										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAPs	Worst Case Single Hap
Primers (EU-01)	5.82	5.82	5.82	0.00	0.00	4.42	0.00	2.08	2.08	Triethylamine
Paints (EU-01)	8.80	8.80	8.80	0.00	0.00	12.45	0.00	1.03	1.03	Glycol Ethers
Clean-up (EU-01)	0.13	0.13	0.13	0.00	0.00	4.68	0.00	1.16	0.82	Toluene
Metal Prep (EU-01)	0.00	0.00	0.00	0.00	0.00	3.93	0.00	0.00	0.00	
Touch-up Spray Paints (IA-01)	0.13	0.13	0.13	0.00	0.00	3.00	0.00	0.99	0.99	Toluene
Natural Gas Combustion - Space Heaters	0.04	0.18	0.18	0.01	2.37	0.13	1.99	0.04	0.04	Hexane
Welding/Cutting (IA-03)	8.84	8.84	8.84	0.00	0.00	0.00	0.00	0.22	0.21	Manganese
<b>TOTAL</b>	<b>23.75</b>	<b>23.89</b>	<b>23.89</b>	<b>0.01</b>	<b>2.37</b>	<b>28.60</b>	<b>1.99</b>	<b>5.53</b>	<b>2.08</b>	Triethylamine

PM10=PM=PM2.5

**Methodology:**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process cc

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode us

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

VOC and Particulate

From Surface Coating Operations

Company Name: Galfab Acquisition, LLC  
 Address City IN Zip: 612 West 11th St., Winamac, IN 46996  
 Permit Number: 131-36912-00018  
 Reviewer: Vasantha Palakurti

**EU-01 Primer Usage**

Material	ID#	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)	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)	Transfer Efficiency
<b>Primers</b>															
Gray Epoxy Ester	MP-90	10.84	45.56%	36.42%	0.09	47.34%	2.0	0.450	1.88	0.99	0.89	21.40	3.91	5.82	75%
Red Oxide Epoxy Ester	MP-26D	10.55	48.21%	38.35%	0.10	48.51%	2.0	0.450	2.02	1.04	0.94	22.47	4.10	5.38	75%
Gray Primer	MP-105D	10.46	55.96%	45.25%	0.11	56.76%	2.0	0.450	2.59	1.12	1.01	24.20	4.42	4.54	75%

**Add worst case coating to all solvents**

4.42	5.82
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Note: Potential VOC tons/year is the combined total of using all three rooms in a series based on the highest paint capacity product, not each.

**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

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

**Company Name: Galfab Acquisition, LLC  
Address City IN Zip: 612 West 11th St., Winamac, IN 46996  
Permit Number: 131-36912-00018  
Reviewer: Vasantha Palakurti**

**EU-01 Paint Usage**

Material	ID#	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)	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)	Transfer Efficiency
<b>PAINTS</b>															
White	MP-1	10.21	56.29%	42.04%	14.25%	51.46%	4.0	0.450	3.00	1.45	2.62	62.85	11.47	8.80	75.00%
White	MP-1D	9.67	62.49%	51.42%	11.07%	59.62%	4.0	0.450	2.65	1.07	1.93	46.24	8.44	7.15	75.00%
Black	MP-2D	8.41	74.32%	57.55%	16.77%	58.04%	4.0	0.450	3.36	1.41	2.54	60.93	11.12	4.26	75.00%
Red	MP-5D	8.52	68.99%	50.45%	18.54%	51.53%	4.0	0.450	3.26	1.58	2.84	68.24	12.45	5.21	75.00%
Medium Blue	MP-6	8.62	69.40%	54.11%	15.29%	55.93%	4.0	0.450	2.99	1.32	2.37	56.94	10.39	5.20	75.00%
Medium Blue	MP-60	8.70	71.31%	55.80%	15.51%	58.20%	4.0	0.450	3.23	1.35	2.43	58.29	10.64	4.92	75.00%
Dark Green	MP-11	8.67	68.87%	53.58%	15.29%	55.70%	4.0	0.450	2.99	1.33	2.39	57.27	10.45	5.32	75.00%
Medium Green	MP-12	8.53	68.20%	51.63%	16.57%	52.81%	4.0	0.450	3.00	1.41	2.54	61.06	11.14	5.35	75.00%
Chrome Yellow	MP-16D	8.68	69.57%	54.36%	15.21%	56.58%	4.0	0.450	3.04	1.32	2.38	57.03	10.41	5.21	75.00%
Cocoa Brown	MP-18	8.77	68.20%	53.17%	15.03%	55.91%	4.0	0.450	2.99	1.32	2.37	56.94	10.39	5.50	75.00%
Beige	MP-19	9.83	60.02%	46.09%	13.93%	54.33%	4.0	0.450	3.00	1.37	2.46	59.15	10.80	7.75	75.00%
Diamond Brown	MP-20D	8.80	70.65%	54.85%	15.80%	57.88%	4.0	0.450	3.30	1.39	2.50	60.07	10.96	5.09	75.00%
Packer Green	MP-33	8.80	66.66%	51.62%	15.04%	54.47%	4.0	0.450	2.91	1.32	2.38	57.18	10.43	5.78	75.00%
UPS Brown	MP-41D	8.75	71.09%	55.77%	15.32%	58.51%	4.0	0.450	3.23	1.34	2.41	57.91	10.57	4.99	75.00%
USA Waste Green	MP-56	8.67	70.46%	56.00%	14.46%	58.22%	4.0	0.450	3.00	1.25	2.26	54.16	9.88	5.05	75.00%
Onyx Green	MP-70SW	8.51	67.38%	52.22%	15.16%	53.26%	4.0	0.450	2.76	1.29	2.32	55.73	10.17	5.47	75.00%
Allied Waste Blue	MP-90D	8.61	74.46%	62.27%	12.19%	64.29%	4.0	0.450	2.94	1.05	1.89	45.34	8.27	4.33	75.00%
Premier Orange	MP-98D	8.67	70.32%	55.33%	14.99%	57.52%	4.0	0.450	3.06	1.30	2.34	56.14	10.25	5.07	75.00%

Note: Potential VOC tons/year is the combined total of using all three rooms in a series based on the highest paint capacity product, not each.

**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

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

**Company Name: Galfab Acquisition, LLC  
Address City IN Zip: 612 West 11th St., Winamac, IN 46996  
Permit Number: 131-36912-00018  
Reviewer: Vasantha Palakurti**

**Clean-up Process for Paint Guns & Tools**

Material	ID#	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)	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)	Transfer Efficiency
Laquer Thinner	MP-23D	6.95	100.00%	18.97%	81.03%	0.0%	0.10	0.450	5.63	5.63	0.25	6.08	1.11	0.00	75%
Mineral Spirits	MP-24	6.55	100.00%	0.00%	100.00%	0.0%	0.10	0.450	6.55	6.55	0.29	7.07	1.29	0.00	75%
Paint Gun Cleaner	MP-27	8.51	95.00%	72.40%	22.60%	0.0%	0.60	0.450	1.92	1.92	0.52	12.46	2.27	0.13	75%

<b>4.68</b>	<b>0.13</b>
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**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

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

**Company Name: Galfab Acquisition, LLC  
Address City IN Zip: 612 West 11th St., Winamac, IN 46996  
Permit Number: 131-36912-00018  
Reviewer: Vasantha Palakurti**

**Metal Preparation Process**

Material	ID#	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)	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)	Transfer Efficiency
Butyl Cellosolve	MP-102	7.51	100.00%	0.0%	100.0%	0.0%	0.02000	0.450	7.51	7.51	0.07	1.62	0.30	0.00	75%
VMP NAPTHA	MP-8	6.15	100.00%	0.0%	100.0%	0.0%	0.30000	0.450	6.15	6.15	0.83	19.93	3.64	0.00	75%
													<b>3.93</b>	<b>0.00</b>	

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

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

**Company Name: Galfab Acquisition, LLC  
Address City IN Zip: 612 West 11th St., Winamac, IN 46996  
Permit Number: 131-36912-00018  
Reviewer: Vasantha Palakurti**

**TOUCH UP BOOTH (1A-1)**

Material	ID#	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)	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)	Transfer Efficiency
Spray Black	MP-28	7.97	80.00%	0.0%	80.0%	0.0%	0.10000	0.450	6.38	6.38	0.29	6.89	1.26	0.08	75%
Spray Gray Primer	MP-47	9.80	90.00%	0.0%	90.0%	0.0%	0.10000	0.450	8.82	8.82	0.40	9.53	1.74	0.05	75%

**Potential Emissions**

<b>16.41</b>	<b>3.00</b>	<b>0.13</b>
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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)

**Appendix A: Emission Calculations  
HAP Emission Calculations**

Company Name: Galfab Acquisition, LLC  
Address City IN Zip: 612 West 11th St., Winamac, IN 46996  
Permit Number: 131-36912-00018  
Reviewer: Vasantha Palakurti

**EU-01 and 1A-1 HAPs**

Material	ID#	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Cobalt Compounds	Weight % Xylene&Ebenz	Weight % Toluene	Weight % Triethylamine	Weight % Glycol Ethers	Weight % Methanol	Cobalt Compounds (ton/yr)	Xylene & Ebenz Emissions (ton/yr)	Toluene Emissions (ton/yr)	Triethylamine Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	TOTAL HAPs PTE (ton/yr)
<b>Primers</b>																	
Gray Epoxy Ester	MP-90	10.84	2.00	0.450				1.20%						0.51			0.51
Red Oxide Epoxy Ester	MP-26D	10.55	2.00	0.450				5.00%						2.08			2.08
Gray Primer	MP-105D	10.46	2.00	0.450													0.00
<b>Paints</b>																	
White	MP-1	10.21	4.00	0.450													0.00
White	MP-1D	9.67	4.00	0.450	0.001					0.09							0.00
Black	MP-2D	8.41	4.00	0.450	0.002			1.20%		0.11		0.80					0.80
Red	MP-5D	8.52	4.00	0.450								0.00					0.00
Medium Blue	MP-6	8.62	4.00	0.450											0.00		0.00
Medium Blue	MP-6D	8.70	4.00	0.450	0.002			1.20%		0.11		0.82					0.82
Dark Green	MP-11	8.67	4.00	0.450													0.00
Medium Green	MP-12	8.53	4.00	0.450													0.00
Chrome Yellow	MP-16D	8.68	4.00	0.450	0.002					0.11							0.00
Cocoa Brown	MP-18	8.77	4.00	0.450													0.00
Beige	MP-19	9.83	4.00	0.450													0.00
Diamond Brown	MP-20D	8.80	4.00	0.450	0.002			1.10%		0.12			0.76				0.76
Packer Green	MP-33	8.80	4.00	0.450													0.00
UPS Brown	MP-41D	8.75	4.00	0.450	0.002			1.50%		0.10			1.03				1.03
USA Waste Green	MP-56	8.67	4.00	0.450													0.00
Onyx Green	MP-70SW	8.51	4.00	0.450													0.00
Allied Waste Blue	MP-90D	8.61	4.00	0.450	0.001					0.08							0.00
Premier Orange	MP-98D	8.67	4.00	0.450	0.002			1.50%		0.10			1.03				1.03
<b>Clean-up</b>																	
Laquer Thinner	MP-23D	6.95	0.10	0.450			60.00%			25.00%			0.82			0.34	1.16
Mineral Spirits	MP-24	6.55	0.10	0.450													0.00
Paint Gun Cleaner	MP-27	8.51	0.60	0.450													0.00
<b>Metal Prep</b>																	
Butyl Cellosolve	MP-102	10.04	0.02	0.450									0.00				0.00
VMP Naptha	MP-8	10.04	0.30	0.450									0.00				0.00
<b>Touch-Up Spray Paint</b>																	
Spray Black	MP-28	10.04	0.10	0.450		30.00%	20.00%					0.59	0.40				0.99
Spray Gray Primer	MP-47	10.04	0.10	0.450								0.00	0.00				0.00
<b>"Worst Case" Individual HAP</b>												<b>0.59</b>	<b>0.40</b>	<b>2.08</b>	<b>1.03</b>	<b>1.16</b>	
<b>"Worst Case" Total HAPs</b>												<b>5.26</b>					

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name: Galfab Acquisition, LLC**  
**Address City IN Zip: 612 West 11th St., Winamac, IN 46996**  
**Permit Number: 131-36912-00018**  
**Reviewer: Vasantha Palakurti**

**Space Heaters and Air-Makeup Units - combined capacity**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
5.40	1000	47.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.04	0.18	0.18	0.01	2.37	0.13	1.99

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

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name:** Galfab Acquisition, LLC  
**Address City IN Zip:** 612 West 11th St., Winamac, IN 46996  
**Permit Number:** 131-36912-00018  
**Reviewer:** Vasantha Palakurti

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.967E-05	2.838E-05	1.774E-03	4.257E-02	8.042E-05
HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.183E-05	2.602E-05	3.311E-05	8.988E-06	4.967E-05
<b>Total</b>					<b>4.464E-02</b>

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.  
 See next page for Greenhouse Gas calculations.

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

**Greenhouse Gas Emissions  
 Company Name: Galfab Acquisition, LLC  
 Address City IN Zip: 612 West 11th St., Winamac, IN 46996  
 Permit Number: 131-36912-00018  
 Reviewer: Vasantha Palakurti**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,838	0.1	0.1
Summed Potential Emissions in tons/yr	2,838		
CO2e Total in tons/yr	2,856		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.  
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting Operations**

**Company Name:** Galfab Acquisition, LLC  
**Address City IN Zip:** 612 West 11th St., Winamac, IN 46996  
**Permit Number:** 131-36912-00018  
**Reviewer:** Vasantha Palakurti

PROCESS WELDING	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10 = PM2.5	Mn	Ni	Cr	PM = PM10 = PM2.5	Mn	Ni	Cr	
Metal Inert Gas (MIG)(carbon steel)	5.00	1.50	0.01	0.00	0.00	0.00	0.04	0.00	0.00	0.00	0.00
<b>Emissions (tons/yr)</b>							<b>0.18</b>	<b>0.02</b>	<b>0.00</b>	<b>0.00</b>	<b>0.02</b>

**Methodology:**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column  
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)  
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day  
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting Operations**

**Company Name: Galfab Acquisition, LLC  
Address City IN Zip: 612 West 11th St., Winamac, IN 46996  
Permit Number: 131-36912-00018  
Reviewer: Vasantha Palakurti**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10 = PM2.5	Mn	Ni	Cr	PM = PM10 = PM2.5	Mn	Ni	Cr	
WELDING												
Submerged Arc	0	0		0.036	0.011			0.000	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(carbon steel)	51	1.50		0.0055	0.0005			0.421	0.038	0.000	0	0.038
Stick (E7018 electrode)	2	1.80		0.0211	0.0009			0.076	0.003	0.000	0	0.003
Tungsten Inert Gas (TIG)(carbon steel)	1	2.00		0.0055	0.0005			0.011	0.001	0.000	0	0.001
Oxyacetylene(carbon steel)	1	0.50		0.0055	0.0005			0.003	0.000	0.000	0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10 = PM2.5	Mn	Ni	Cr	PM = PM10 = PM2.5	Mn	Ni	Cr	
Oxyacetylene	15	0.25	20	0.1622	0.0005	0.0001	0.0003	0.730	0.002	0.000	0.001	0.004
Oxpropylene	1	2	40	0.1622	0.0005	0.0001	0.0003	0.779	0.002	0.000	0.001	0.004
Oxymethane	0	0		0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0		0.0039				0.000	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								2.02	0.05			0.05
Potential Emissions lbs/day								48.45	1.14			1.23
Potential Emissions tons/year								8.84	0.21			0.22

**Methodology:**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 l



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

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

**TO:** Bill Geise  
Galfab Acquisition, LLC  
612 W 11th Street  
Winama, IN 46996

**DATE:** March 24, 2016

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

**SUBJECT:** Final Decision  
MSOP - Administrative Amendment  
131 - 36912 - 00018

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Ben Scheiner, Plant Manager  
Melissa Paar Bruce Carter Associates  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	LPOGOST 3/24/2016 Galfab Acquisition, LLC 131 - 36912 - 00018 final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

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1		<del>Bill Geise Galfab Acquisition, LLC 612 W 11th Street Winama IN 46996 (Source CAATS)</del> Via USPS certified mail										
2		Ben Scheiner Plant Manager Galfab Acquisition, LLC 612 W 11th Street Winaman IN 46996 (RO CAATS)										
3		Mr. Gary Hanner Hanner Hanner & Hanner P.O. Box 122 Rockville IN 47872 (Affected Party)										
4		Pulaski County Commissioners 112 East Main Street, Rm 200 Winamac IN 46996 (Local Official)										
5		Winamac Town Council and Town Manager 120 West Main Street Winamac IN 46996 (Local Official)										
6		Pulaski County Health Department 125 S. Riverside Dr, County Bldg, Suite 205 Winamac IN 46996-1528 (Health Department)										
7		Melissa Paar Bruce Carter Associates 616 S 4th Street Elkhart IN 46514 (Consultant)										
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