



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

April 23, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant
RE: Rotary Lift / T077-7652-00011
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Rotary Lift
2700 Lanier Drive
Madison, Indiana 47250**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T077-7652-00011	
Issued by: Original signed by Paul Dubenetzky Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 23, 2004 Expiration Date: April 23, 2009



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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, A.3 and A.4 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary source that consist of two automotive hydraulic lift manufacturing plants.

Responsible Official:	Vice President of Global Operations
Source Address:	2700 Lanier Drive, Madison, Indiana 47250
Mailing Address:	P.O. Box 1560, 2700 Lanier Drive, Madison, Indiana 47250
General Source Phone Number:	(812) 273-1622
SIC Code:	3534
County Location:	Jefferson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This Automotive Hydraulic Lift Manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 2700 Lanier Drive, Madison, IN 47250; and
- (b) Plant 2 is located at 2700 Lanier Drive, Madison, IN 47250.

Since the two (2) plants are located on contiguous properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Three (3) Wash Tanks, each of which is the 1st stage of either a 3 stage washer or a 2 stage washer. The wash tank identified as EU 1-3 installed in 1996 is part of a 3 stage washer, and the wash tanks identified as EU 2-3 installed in 1996 and EU 2-4 installed in 1997 are each part of separate 2 stage washers. The three (3) Wash Tanks (EU 1-3, 2-3 and 2-4) each have a maximum capacity of 2.5 tons steel per hour, and exhaust through stacks (S/V 1-4, 2-15 and 2-2 respectively).

In the event 2-Butoxyethanol is removed from the list of hazardous air pollutants, the three (3) wash tanks will become insignificant activities.

- (b) One (1) Wet Paint Line consisting of one (1) Baking Enamel Paint Booth, identified as EU 1-2, installed in 1985, with a nominal capacity of 5 gallons of paint per hour, using dry filters as particulate control exhausting to two (2) stacks (S/V 1-19 and 1-20).
- (c) One (1) Epoxy Paint Line consisting of one (1) Epoxy Paint Booth, identified as (EU 2-2), installed in 1988, with a nominal capacity of 6 gallons of paint per hour, using dry filters as particulate control, and exhausting to three (3) stacks (S/V 2-9 thru 2-11).

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities:

- (a) The following facilities with uncontrolled potential emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM_{10}) less than five (5) pounds per hour as defined in 326 IAC 2-7-1(21)(B) [326 IAC 6-3-2]:
 - (1) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 1-1), with a nominal capacity of 6,000 pounds of steel and 30 pounds of Steel Shot per hour.
 - (2) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 2-1), with a nominal capacity of 6,000 pounds of steel and 50 pounds of Steel Shot per hour, with dry filter particulate control and exhausting to stack (S/V 2-8).

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (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 or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this

permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

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

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable [326 IAC 2-7-9(b)].

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

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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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

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

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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.

(2) If IDEM, OAQ, upon receiving a timely and complete 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

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 2-7 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 in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 **Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]**
- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) 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. This condition is not federally enforceable.
- C.2 **Opacity [326 IAC 5-1]**
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (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.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 **Stack Height [326 IAC 1-7]**
- The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.
- C.8 **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 the notification requirements (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
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plan shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6-6. The emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of pollutants from the source in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Facility Description [326 IAC 2-7-5(15)]:

- (a) Three (3) Wash Tanks, each of which is the 1st stage of either a 3 stage washer or a 2 stage washer. The wash tank identified as EU 1-3 installed in 1996 is part of a 3 stage washer, and the wash tanks identified as EU 2-3 installed in 1996 and EU 2-4 installed in 1997 are each part of separate 2 stage washers. The three (3) Wash Tanks (EU 1-3, 2-3 and 2-4) each have a maximum capacity of 2.5 tons steel per hour, and exhausting through stacks (S/V 1-4, 2-15 and 2-2 respectively).

In the event 2-Butoxyethanol is removed from the list of hazardous air pollutants, the three (3) wash tanks will become insignificant activities without specific regulations and will no longer be covered by any specific or general permit terms.

- (b) One (1) Wet Paint Line consisting of one (1) Baking Enamel Paint Booth, identified as EU 1-2, installed in 1985, with a nominal capacity of 5 gallons of paint per hour, using dry filters as particulate control exhausting to two (2) stacks (S/V 1-19 and 1-20).
- (c) One (1) Epoxy Paint Line consisting of one (1) Epoxy Paint Booth, identified as (EU 2-2), installed in 1988, with a nominal capacity of 6 gallons of paint per hour, using dry filters as particulate control, and exhausting to three (3) stacks (S/V 2-9 thru 2-11).

(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 2-7-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart M.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (a) All coating operations as defined in 40 CFR 63.3981;
 - (b) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (c) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (d) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the one (1) Wet Paint Booth (Baking Enamel), identified as EU 1-2 and one (1) Epoxy Paint Booth, identified as EU 2-2 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

D.1.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the two paints booths (EU 1-2 and EU 2-2) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two paint booths (EU 1-2 and EU 2-2) and any control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limit contained in condition D.1.3 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.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V 1-19 and 1-20; as well as S/V 2-9 thru S/V 2-11) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. If inclement weather prevents safe access to the rooftop for an entire month, then the Permittee is excused from the requirement to perform the inspection of the rooftop for the presence of overspray for that month. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records to document that all coatings used at a given paint line have a VOC content of less than 3.5 pounds per gallon of coating minus water and that no solvents containing VOC's have been added to change the as applied VOC content.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (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.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan. If rooftop inspections were not performed for any month due to inclement weather, the Permittee shall make a record of the type(s) of inclement weather and an explanation of why the inclement weather made rooftop access unsafe.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: The following insignificant activities:

- (a) The following facilities with uncontrolled potential emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM_{10}) less than five (5) pounds per hour as defined in 326 IAC 2-7-1(21)(B) [326 IAC 6-3-2]:
 - (1) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 1-1), with a nominal capacity of 6,000 pounds of steel and 30 pounds of Steel Shot per hour.
 - (2) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 2-1), with a nominal capacity of 6,000 pounds of steel and 50 pounds of Steel Shot per hour, with dry filter particulate control and exhausting to stack (S/V 2-8).

(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 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shotblasters identified as EU 1-1 and EU 2-1 respectively, shall be limited to 8.59 lb/hr and 8.61 lb/hr respectively, when operating at the process weight rate of 6030lb/hr and 6050 lb/hr respectively. The allowable particulate emission from each insignificant activity listed under D.2 shall not exceed allowable particulate emission rate based on the following equation:

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

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

Compliance Determination Requirement

D.2.2 Particulate Control

In order to comply with D.2.1, the cartridge filters for particulate control shall be in operation and control emissions from the shot blasters at all times that the shot blasting operations are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Rotary Lift
Source Address: 2700 Lanier Drive, Madison, Indiana 47250
Mailing Address: P.O. Box 1560, 2700 Lanier Drive, Madison, Indiana 47250
Part 70 Permit No.: T077-7652-00011

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Rotary Lift
Source Address: 2700 Lanier Drive, Madison, Indiana, 47250
Mailing Address: P.O. Box 1560, 2700 Lanier Drive, Madison, Indiana, 47250
Part 70 Permit No.: T077-7652-00011

This form consists of 2 pages

Page 1 of 2

- 9 This is an emergency as defined in 326 IAC 2-7-1(12)
 - C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Rotary Lift
 Source Address: 2700 Lanier Drive, Madison, Indiana 47250
 Mailing Address: P.O. Box 1560, 2700 Lanier Drive, Madison, Indiana 47250
 Part 70 Permit No.: T077-7652-00011

Months: _____ to _____ Year: _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**Addendum to the
Technical Support Document for a Part 70 Operating Permit**

Source Name: Rotary Lift
Source Location: 2700 Lanier Drive, Madison, Indiana 47250
County: Jefferson
SIC Code: 3534
Operation Permit No.: T077-7652-00011
Permit Reviewer: FO/EVP

On November 13, 2003, the Office of Air Quality (OAQ) had a notice published in the Madison Courier, Madison, Indiana, stating that Rotary Lift had applied for a Part 70 Operating Permit relating to the operation of two automotive hydraulic lift manufacturing plants. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 15, 2003, Jim Hauck of Baker & Daniels, Attorneys for Rotary Lift, submitted comments on the proposed Part 70 Operating Permit. The summary of the comments and corresponding responses is as follows:

Comment 1

A.1 General Information: The word "stationary" between "two" and "automotive" should be removed, or the sentence should be reworded. If the word refers to a "stationary source," the sentence could be rewritten to make that clear –however, this may conflict with the Part 70 Source Definition at A.2. If it means that the lifts manufactured are stationary, it is an incorrect and unnecessary adjective (some of the lifts do have wheels and can be removed).

Response to Comment 1

The description of the source in A.1. General Information has been revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
The Permittee owns and operates a **stationary source that consists of two stationary** automotive hydraulic lift manufacturing plants.

Responsible Official:	Vice President of Global Operations
Source Address:	2700 Lanier Drive, Madison, Indiana 47250
Mailing Address:	P.O. Box 1560, 2700 Lanier Drive, Madison, Indiana 47250
General Source Phone Number:	(812) 273-1622
SIC Code:	3534
County Location:	Jefferson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, Section 112 of the Clean Air Act

Comment 2

A.3 (a) Emission Units and Pollution Control Equipment Summary:

- (a) The first sentence is missing the words (at the end of the sentence) “or a 2 stage washer.”
- (b) On the fourth and fifth lines the phrase “have a combined” should be replaced with each have a.” (Alternatively, the “2.5” could be changed to “7.5”.)
- (c) In the fifth line, the words “exhausting to” should be replaced with “exhaust through.”
- (d) On November 21, 2003, USEPA issued a proposed rule (68 FR 65648) to delete 2-Butoxyethanol from the group of glycol ethers that are HAPS. If EPA completes the proposed rulemaking, the wash tanks would become insignificant activities and no longer need to be listed in the permit because the only potential emissions for each wash tank would be approximately 10 pounds per day of VOC. We request that the following wording be added to permit: “In the event 2-Butoxyethanol is removed from the list of hazardous air pollutants, the three (3) wash tanks will become insignificant activities without specific regulations and will no longer be covered by any specific regulations and will no longer be covered by any specific or general permit terms. “

Response to Comment 2

Section A.3(a) has been revised in accordance with the Comment 2 (a), (b) and (c) as below. The source also requested that since USEPA has proposed the deletion of 2-Butoxyethanol from the group of glycol ethers that are HAPs as explained in the Comment 2 above and requested that a statement be added to specific that this proposed rule will make the units listed in A.3 (a) insignificant activities. This change has also been made in Section D.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Three (3) Wash Tanks, each of which is the 1st stage of either a 3 stage washer or **a 2 stage washer**. The wash tank identified as EU 1-3 installed in 1996 is part of a 3 stage washer, and the wash tanks identified as EU 2-3 installed in 1996 and EU 2-4 installed in 1997 are each part of separate 2 stage washers. The three (3) Wash Tanks (EU 1-3, 2-3 and 2-4) **each** have a ~~combined~~ maximum capacity of 2.5 tons steel per hour, and exhaust ~~to~~ **through** stacks (S/V 1-4, 2-15 and 2-2 respectively).

In the event 2-Butoxyethanol is removed from the list of hazardous air pollutants, the three (3) wash tanks will become insignificant activities.

Comment 3

A.3 (b) Emission Units and Pollution Control Equipment Summary: In the second line, the words “of paint” should be added between “gallons” and “per hour”.

Response to Comment 3

IDEM, OAQ agrees that the change is necessary to better describe material usage, therefore section A.3 (b) and Section D.1 have been amended as follows:

- (b) One (1) Wet Paint Line consisting of one (1) Baking Enamel Paint Booth, identified as EU 1-2, installed in 1985, with a nominal capacity of 5 gallons **of paint** per hour, using dry filters as particulate control exhausting to two (2) stacks (S/V 1-19 and 1-20).

Comment 4

A.3 (c) Emission Units and Pollution Control Equipment Summary: In the second line, the words “of paint” should be added between “gallons” and “per hour”.

Response to Comment 4

IDEM, OAQ agrees that the change is necessary to better describe material usage, therefore section A.3 (c) and Section D.1 have been amended as follows:

- (c) One (1) Epoxy Paint Line consisting of one (1) Epoxy Paint Booth, identified as (EU 2-2), installed in 1988, with a nominal capacity of 6 gallons **of paint** per hour, using dry filters as particulate control, and exhausting to three (3) stacks (S/V 2-9 thru 2-11).

Comment 5

A.4 (b) Specifically Regulated Insignificant Activities:

- (a) Condition A.4 (b), as well as the corresponding provisions in the Section D.2 Facility Description and Condition D.2.1 (b), should be eliminated because there are no specific regulations applicable to the individual Electric Arc Welders. The draft permit indicates that the process weight rate rule, 326 IAC 6-3-1, covers the welders. However, the welders are exempt from that rule because the potential-to-emit of the individual welders of any series of welders (or, for that matter, all of the welders at either of the two plants) is below the exemption threshold of 0.551 lbs./hr set out in the rule. Reasons:
 - (1) 326 IAC 6-3-1(a) states that the rules “ ...establishes emission limits for manufacturing processes...”
 - (2) 326 IAC 6-3-1 (b) (14) exempts “Manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour.”

- (3) 326 IAC 6-3-1.5(2) defines a “manufacturing process” as “any single or series of actions, operations, or treatments in which a mechanical, physical, or chemical transformation of material occurs that emits , or has the potential to emit, particulate in the production of the product...” Therefore, the exemption in 326 IAC 6-3-1(b)(14) is to be evaluated on a “manufacturing process” basis.
 - (4) Using the uncontrolled emission factor for welding with E7OS wire of 0.0052 pounds/pound of wire used, each individual welder is well below the exemption threshold. Even if multiple welders were considered to be in series and thus could be considered together to constitute a single manufacturing process, the threshold emissions level would not be reached. This is conclusively demonstrated by the fact that total potential emissions for all of the welders in either Plant 1 or Plant 2 do not reach the threshold, as the following calculations illustrate. (Note that this example is overboard in the extreme - all welders in either plant are **not** in a series that would constitute a single manufacturing process):
 - (A) Plant 1 uses 68.6 pounds of wire an hour resulting in uncontrolled potential emissions of 0.357 pounds per hour. Therefore welding at Plant 1 is exempt and not subject to any specific regulatory requirement.
 - (B) Plant 2 uses 31.9 pounds of wire per hour resulting in uncontrolled potential emissions of 0.166 pounds per hour. Therefore welding at Plant 2 is exempt and not subject to any specific regulatory requirement.
- (b) If A.4 (b) is not eliminated, the word “approximately” should be added at the beginning of this section for the following reasons:
- (1) The count of 108 welders (70 in Plant 1 and 38 in Plant 2) was the number on use in October 2002.
 - (2) These welders are physically very small and are easily moved, added and replaced.
 - (3) The number of welders shown on the draft 2002 Technical Support Document appears to be 185, and the total number of welders shown on the initial source list appears to be approximately 248. This illustrates the possible range of welders that could be on-site at any time.

Response to Comment 5

The uncontrolled potential to emit of criteria pollutants, PM/ PM10, from one hundred and eight (108) electric arc welders (Plant 1 has 70 stations and Plant 2 has 38 stations) is 15.63 tons per year (less than five(5) pounds per hour) and there is no significant HAP emissions or regulated HAP emission. Therefore, these one hundred and eight (108) electric arc welders are classified as exempt activities. IDEM, OAQ has agreed to removed condition A.4(b), Section D.2 and D.2.1(b) since these units should not be regarded as specifically regulated insignificant activities . Hence, the permit has been amended as follows:

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities:

- (a) The following facilities with uncontrolled potential emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM_{10}) less than five (5) pounds per hour as defined in 326 IAC 2-7-1(21)(B) [326 IAC 6-3-2]:
 - (1) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 1-1), with a nominal capacity of 6,000 pounds of steel and 30 pounds of Steel Shot per hour.
 - (2) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 2-1), with a nominal capacity of 6,000 pounds of steel and 50 pounds of Steel Shot per hour, with dry filter particulate control and exhausting to stack (S/V 2-8).
- ~~(b) One Hundred and Ten (108) Electric Arc Welders. Plant 1 has 70 stations with the actual average hourly consumption of 0.98 pounds per station equivalent to 68.6 pounds per hour. Plant 2 has 38 stations with actual average hourly consumption of 0.84 pounds per station which equivalent to 31.9 pounds per hour.~~

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: The following insignificant activities:

- (a) The following facilities with uncontrolled potential emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM_{10}) less than five (5) pounds per hour as defined in 326 IAC 2-7-1(21)(B) [326 IAC 6-3-2]:
 - (1) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 1-1), with a nominal capacity of 6,000 pounds of steel and 30 pounds of Steel Shot per hour.
 - (2) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 2-1), with a nominal capacity of 6,000 pounds of steel and 50 pounds of Steel Shot per hour, with dry filter particulate control and exhausting to stack (S/V 2-8).
- ~~(b) One Hundred and Ten (108) Electric Arc Welders. Plant 1 has 70 stations with the actual average hourly consumption of 0.98 pounds per station equivalent to 68.6 pounds per hour. Plant 2 has 38 stations with actual average hourly consumption of 0.84 pounds per station which equivalent to 31.9 pounds per hour.~~

(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 2-7-5(1)]

D.2.1 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 shotblasters identified as EU 1-1 and EU 2-1 respectively, shall be limited to 0.25 lb/hr and 0.35 lb/hr respectively, when operating at the process weight rate of 30lb/hr and 50 lb/hr respectively. The allowable particulate emission from each insignificant activity listed under D.2 shall not exceed allowable particulate emission rate based on the following equation:

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

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

- ~~(b)~~ Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the welding activities with 70 stations located in Plant 1 and 38 stations located in Plant 2 shall be limited to 0.43 pounds per hour and 0.26 pounds per hour respectively when operating at a process weight rate of 68.6 pounds per hour and 31.9 pounds per hour respectively. These limits are determined using the following equation:

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

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

Comment 6

B.14 Deviations from Permit Requirements and Conditions: The deviation reports should be “semi-annual,” not “quarterly”. 326 IAC 2-7-5(C)(i) requires “submittal of reports of any required monitoring **at least once every six (6) months.**” In the light of the small number of underlying monitoring and reporting requirements that could result in a deviation, requiring quarterly reports places an unnecessary and unjustified burden on both the source and the state.

Response to Comment 6

IDEM, OAQ believes that submittal of deviation report quarterly is necessary to evaluate and ensure continuous compliance with the applicable requirements. OAQ reserves the authority to impose a more stringent frequency of reporting deviations. Therefore, the submittal of the deviation reports will not be changed from quarterly to semi-annual in Condition B.14 and on the deviation and compliance monitoring report.

Comment 7

C.8 (c) Asbestos Abatement Projects: In the second line, the word “guidelines” should be changed to “notification requirements”. Reason this is an enforceable regulation, not a suggested guideline.

Response to Comment 7

The word guidelines is appropriate in the context of which it is used and also refers to the notification requirements. However, to clarify, the Condition C.8 (c) has been modified as follows:

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

Comment 8

C.15 Compliance Response Plan: This condition should be deleted because IDEM does not have authority to require it. No statute or regulation requires a “compliance response plan,” and IDEM may not impose substantive new requirements as part of the Title V process.

Response to Comment 8

There is sufficient authority for requiring a Compliance Response Plan (CRP) as part of a Compliance Monitoring Plan (CMP). 326 IAC 2-7-5(1) requires that all Part 70 Permits contain operational requirements and limitations that assure compliance with all applicable requirements. 326 IAC 2-7-5(3) requires that all Part 70 Permits contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. 326 IAC 2-7-5(3)(A)(ii) requires that, at a minimum, the periodic monitoring requirements must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance, even where the applicable requirement does not require periodic testing or compliance monitoring. Every source will need to submit quarterly deviation report, except for sources with an applicable requirement with an alternate schedule for reporting deviations. Those sources will report deviations according to the schedule in the applicable requirement. Also, 326 IAC 2-7-6(a)(1) requires that each Part 70 permit contain compliance certification, testing, monitoring, reporting and record keeping requirements sufficient to assure compliance with the terms and conditions of the Part 70 permit and pursuant to 326 IAC 2-7-6(6), any other provisions that IDEM may require.

It is true that the term “Compliance Response Plan is not found in 326 IAC 2-7-5(3), but subsection (A) of that rule sets out compliance monitoring requirements concerning the use, maintenance, and where appropriate, installation of monitoring equipment or methods. In addition 326 IAC 2-7-5(1) sets out that the permit must contain those operational requirements and limitations that assure compliance with all applicable requirements. Therefore, there have been no changes to this condition in the final permit due to this comment.

Comment 9

C.17 Emission Statement:

- (a) The word "annual" should be removed from the first line of (a), (b) and (c).
- (b) The words "of each year" should be removed from the second line of (a).
- (c) The word "annual" should be removed from the third line of (a).
- (d) The word "annual" should be removed from the second line of (b).

Reason - The underlying regulation 326 IAC 2-6 was amended at the December 3, Air Board meeting to require sources like Rotary Lift to report these emissions only once every three years (in the case of Rotary Lift, which is located in Jefferson County, the first report would be due by July 1, 2006, and would cover the emissions for calender year 2005).

Response to Comment 9

All sources that are Title V are required to comply with the requirements of Condition C.17 under the new amendment. IDEM, OAQ agrees that the condition C.17 should be amended accordingly because of the new amendment. Therefore, the C.17 has been revised as follows:

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6] ~~[326 IAC 2-7-19 (e)]~~

- (a) The Permittee shall submit an ~~annual~~ emission statement certified pursuant to the requirements of 326 IAC 2-6, ~~that~~ **The statement must be received by July 1 of each year in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.** The ~~annual~~ emission statement shall meet the following requirements ~~and be used for the purpose of a Part 70 fee assessment~~:
 - (1) Indicate estimated actual emissions of ~~criteria~~ pollutants from the source, **in compliance with 326 IAC 2-6 (Emission Reporting)**;
 - (2) Indicate estimated actual emissions of ~~other~~ regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- ~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (eb) The ~~annual~~ emission statement 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.

Comment 10

C.19 General Reporting Requirements:

- (a) In line 1 of (a), change "Quarterly to "Semi-Annual". Reason: See Comment 6 above.
- (b) In line 4 of (a), change "within thirty (30) days of the end of " to "by the end of the month following". Reason: The underlying regulations do not specify 30 days and since the two months in question (January and July) both have 31 days, it is easier for the source to maintain compliance on a calendar month basis. Even if IDEM does not grant Semi-Annual reporting, three of the four months during which reports are required have 31, not 30 days.
- (c) In line 5 of (a), change "Quarterly" to "Semi-Annual". Reason: See Comment 6 above.
- (d) In line 2 of (d), change "within thirty (30) days of the end of " to "by the end of the month following". Reason: See Comment 10. B. above.
- (e) Add a new paragraph "(f)" which states: If the reporting deadline in this condition fall on Saturday or State Holiday, any notice, report or other submission required by this permit shall be considered timely if properly submitted by the first State business day following the otherwise applicable deadline.

Response to Comment 10

In accordance with response to Comment 6, there are no changes made to C.19. Also, it is not necessary to add the suggested language in Comment 10(e) since Section C.19 (c) has clearly and adequately stated IDEM policy regarding situations where any report or notice submission that fall on a Saturday or a Sunday or holiday.

Comment 11

D.1.5 (b) Particulate Matter (PM): This condition should be deleted because it is inappropriate to include process weight rate rule requirements in a Title V Permit for a process to which no particulate matter emissions are attributable.

Response to Comment 11

Condition D.1.5(b) has been removed as shown below:

D.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]

~~(a)~~ Pursuant to 40 CFR 52 Subpart P, the PM from the two paints booths (EU 1-2 and EU 2-2) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

~~(b)~~ Pursuant to 40 CFR 52 Subpart P, the particulate matter emissions from the three (3) stage washer tanks (EU 1-3, EU 2-3 and EU 2-4) operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Comment 12

D.1.9 Monitoring: The terms “Weekly observations” in (a) and monthly inspections” in (b) need adequate definition for Rotary to understand how to comply with the Monitoring. We suggest the following definitions to be added to the permit:

- (a) Weekly observations (of the overspray for the surface coating booth stacks) means: A minimum of three minutes of observations of the paint booth stack taken from the ground with the sun in the 140° sector of the observer’s back. Any visible emissions (other than condensed water vapor) indicate that the Compliance Response Plan is to be followed.
- (b) “Monthly inspections of the coating emissions from the stack and the presence of overspray on the rooftops and nearby ground” means: A visual examination of the roof surface around the paint booth stacks for evidence of paint. Any evidence of painting booth paint on the roof surface indicates that the Compliance Response Plan is to be followed. If evidence of paint is found on the roof (or on the nearby ground), that evidence will be documented so that it is not mistaken for overspray during subsequent inspections.
- (c) D.1.9 (b). We would like the monthly roof inspections changed to quarterly because of the safety hazard associated with walking on the roof during the winter months when snow and ice are often present (and when the actual roof surface can not actually be observed). There is no evidence that there has ever been overspray on the roof (or nearby ground), but if it were to occur, the paint will be found during quarterly inspections.

Response to Comment 12

Properly operating the air pollution controls for this surface coating facility is considered by IDEM to be generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test. Such also assures compliance with other applicable rules that limit fugitive dust, opacity, and potential to emit when necessary. Compliance monitoring conditions are in the permit in order to ensure continuous compliance with these requirements. For spray coating operations such as that at Rotary Lift, OAQ has determined such compliance monitoring to consist of weekly visible emissions evaluation of overspray from the surface coating booth stacks and a monthly inspection of the rooftop and nearby ground for a noticeable change in solids deposition. OAQ believes that these requirements are clear and reasonable, and provide the source with the flexibility to determine when, during each week and month, such observations should be taken to ensure ongoing compliance. The Permittee’s proposals in comments (a) and (b) are among many acceptable methods of fulfilling this requirement. Therefore, there is no change to this condition due to comments (a) and (b).

With regard to comment (c), the suggested reduction in the frequency of observation (i.e., monthly to quarterly) would not accomplish the purpose of continuous compliance monitoring. Monitoring for the presence of overspray ensures that the facility and the control device are operating properly, and IDEM believes that a monthly frequency is reasonable for this purpose. IDEM recognizes that in extreme circumstances accumulated ice and snow may prohibit safe rooftop access for a full month during the winter. To assure safety of the employees during such months when viewing of the rooftop is not practical, the records of monthly overspray observations should include a statement that overspray emissions were observed at the nearby ground only, and that the rooftop was inaccessible and include a description of the type of month-long inclement weather which prevented viewing the rooftop. There is no change to this condition due to comment (c).

Comment 13

D.1.9 Monitoring. This section should say it is not federally enforceable because all of this monitoring is to determine compliance with D.1.6, which states that it is not federally enforceable.

Response to Comment 13

Condition D.1.9 does not refer to compliance with D.1.6 alone. Also D.1.9 refers to compliance with D.1.5 which is federally enforceable. Additionally, IDEM, OAQ has authority under 2-7-6(1) and 2-7-5(1) to require compliance monitoring and those rules are federally enforceable.

Comment 14

D.1.10 Record Keeping Requirements (a): In the fourth line, "Condition D.1.1." should be "Condition D.1.3."

Comment 15

D.1.10 Record Keeping Requirements (a): Please start the sixth line with "As an alternative to keeping the records in accordance with (1) through (4) below,"

Comment 16

D.1.10 Record Keeping Requirements (a): Delete conditions (3) & (4) because there is no regulatory basis for these records.

Responses to Comments 14, 15 and 16

As requested in Comment 14, D.1.10 (a) has been changed accordingly (see below). In addition, since the source is using compliant coatings, it is not necessary to keep daily records. IDEM, OAQ believes that keeping monthly records is sufficient to demonstrate compliance. Therefore, Condition D.1.10 (a) (2) has been changed as shown below. Also, conditions D.1.10(a) (3) & (4) have removed.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records to document that all coatings used at a given paint line have a VOC content of less than 3.5 pounds per gallon of coating minus water and that no solvents containing VOC's have been added to change the as applied VOC content.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent less water used on a ~~daily~~ **monthly** basis.
 - (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.
 - ~~(3) The daily cleanup solvent usage; and~~
 - ~~(4) The total VOC usage for each day.~~
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 17

D.1.10 Record Keeping Requirements (b): This section should say this it is not federally enforceable because these records are required for the purpose of demonstrating compliance with D.1.6, which states that it is not federally enforceable.

Response to Comment 17

Condition D.1.10 does not refer to compliance with D.1.6 alone. It also refers to compliance with D.1.5 which is federally enforceable. Additionally, IDEM, OAQ has authority under 2-7-6(1) and 2-7-5(1) to require compliance monitoring and those rules are federally enforceable

Comment 18

D.1.10 Record Keeping Requirements (c): This paragraph should be removed because it is redundant to C.17 and C.18.

Response to Comment 18

D.1.10 (c) has not been removed because it clarifies that C.17 and C.18 apply to these record keeping requirements.

Comment 19

D.2.1 Particulate (a):

- (a) The limits listed in line 3 should be changed to 8.58 lb/hr and 8.61 lb/hr based upon the weight of steel (6,000 lb/hr in each case) plus the added shot.
- (b) Even if the baghouses were individually subject to an emission limit calculated without considering the steel that is being cleaned (the reason that the shot blasting operation exists), 326 IAC 6-3-2 (e) (2) states that the emission limit is never less than 0.551 lbs/hour.

Response to Comment 19

The limits in D.2.1 have been changed accordingly as follows:

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shotblasters identified as EU 1-1 and EU 2-1 respectively, shall be limited to ~~0.25~~ **8.59** lb/hr and ~~0.35~~ **8.61** lb/hr respectively, when operating at the process weight rate of ~~30~~ **6030** lb/hr and ~~50~~ **6050** lb/hr respectively. The allowable particulate emission from each insignificant activity listed under D.2 shall not exceed allowable particulate emission rate based on the following equation:

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

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

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

Comments on Technical Support Document

Comment 1

History: In the last line, add, "that was received" between "supplement" and "on."
Reason - The application Supplement was actually "sent" on November 27.

Response to Comment 1

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

IDEM, OAQ agrees that the TSD should have read as follows:

History

On December 13, 1996, Rotary Lift submitted an application for a Part 70 (Title V) Operating Permit to the OAQ. The application was determined to be administratively complete under the requirements for operation. It was found after technical reviews, that Rotary Lift was non-compliant with 326 IAC 8-2-9. A Notice of Deficiency was sent to Rotary Lift in July 2001. Subsequently, Rotary Lift sent a Title V application supplement on **November 27**, 2002.

Comment 2

Insignificant Activities (b): Please remove the word "long" between "gas fired" and "Curing/Drying Oven"

Response to Comment 2

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

IDEM, OAQ agrees that the TSD should have read as follows:

- (b) One (1) natural gas fired ~~long~~ Curing/Drying Oven with a cooling area for the Wet Paint Line, with a maximum capacity of 3.2 million BTU per hour and exhausting to two (2) stacks (S/V 1-9 and S/V 1-48).

Comment 3

Insignificant Activities (c): Please remove the word "long" between "gas fired" and "Curing/Drying Oven"

Response to Comment 3

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

IDEM, OAQ agrees that the TSD should have read as follows:

- (c) One (1) natural gas fired ~~long~~ Curing/Drying Oven with a cooling area for the Epoxy Paint Line, with a maximum capacity of 4.0 million BTU per hour and exhausting to two (2) stacks (S/V 2-4 and S/V 2-1).

Comment 4

Insignificant Activities (m): The numbering should restart at (1), not (12).

Response to Comment 4

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

IDEM, OAQ agrees that the TSD should have read as follows:

- (m) The following activities have been identified by source as trivial activities:
- (~~12~~ 1) Four (4) closed non-vented Rotary Tumblers (two (2) located in Plant 1 and two (2) located in Plant 2) used for cleaning or deburring metal products without abrasive blasting.
 - (~~13~~ 2) Two (2) Powder Paint Booths located at Plant 1
 - (~~14~~ 3) Two (2) Powder Paint Booths located at Plant 2
 - (~~15~~ 4) One (1) Assembly Operation, identified as EU 36, and associated with the Arm Cell process is the last step before shipping. This may include bolting parts together, putting parts into shipping containers and banding the various shipping containers together to prepare a specific model of the product for shipment
 - (~~16~~ 5) Two (2) Excess Shot removal operations associated with the two (2) shotblasters (EU 1-1 and EU 2-1 respectively) are used to blow any remaining shot residue off of the cleaned parts using compressed air before they are painted.
 - (~~17~~ 6) Six (6) Final Assembly consist of packaging the various parts needed to make a final product for shipping. This may include bolting parts together, putting parts into shipping containers and banding the various shipping containers together to prepare a specific model of the product for shipment.
 - (~~18~~ 7) One (1) Cincinnati Laser

Comment 5

Existing Approvals:

- (a) Please add Operation Permit No. 39-06-8-006, Issued on June 19, 1974 at the front of the list of previous approvals.
- (b) Please add to the exception list (conditions not included in the Title V Permit). "(2) All conditions of the July 7, 1988 "Registered Construction and Operation Status - Madison Metal Fabrication Plant" issued for Plant 2 have been eliminated because of the requirement that the plant comply with 326 IAC 8-2-9.

Response to Comment 5

The operating permit No. 39-06-8-006, issued on June 19, 1974 should have been included in the list of previous approvals. All the conditions from OP 39-06-6-006 were included in the permit.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

IDEM, OAQ agrees that the TSD should have read as follows:

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) **OP 39-06-8-006, issued on June 19, 1974;**
- (b) OP 39-01-83-0035, issued on February 28, 1979;
- (c) OP 39-01-83-0038, issued on May 25, 1979;
- (d) OP 39-01-87-0052, issued on February 15, 1983;
- (e) OP 39-01-91-0065, issued on May 27, 1987; and
- (f) Registration for Construction and Operation Status issued on July 7, 1988.

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

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

- (a) OP-39-01-83-0035, issued on February 28, 1979.

All conditions are not incorporated.

Reason not incorporated: OP-39-01-83-0035 was voided and replaced by OP 39-01-83-0038.

- (b) **The conditions of the July 7, 1988 “ Registered Construction and Operation Status - Madison Metal Fabrication Plant” issued for Plant 2 were not incorporated in the Title V permit because of the requirement that the plant comply with 326 IAC 8-2-9.**

Comment 6

Emission Calculations and Potential to Emit After Issuance including Appendix A Emission Calculations:

The emission calculations at Appendix A should be corrected for the following reasons: *(Note: The differences do not impact the potential to emit tables or conclusions, but do impact the emission tables)*

- (a) On Appendix A, page 2 of 13, the potential VOC tons per year are calculated using existing paint VOC lb/gallon (in column 9). The source believes that the potential VOC emissions should be calculated at the regulatory limit of 3.5 lbs VOC per gallon of coating (minus water and exempt solvents). This change increases the calculated Potential VOC emissions shown in column 13 from 66.13 tons per year to 77.67 tons per year.

- (b) On Appendix A, page 2 of 13, the Particulate Potential (column 14) is calculated on the basis that everything that is not a VOC is a particulate—this method assumes that the exempt solvents are potential particulate emissions. However, these exempt solvents evaporate and do not add to the potential particulate emissions. (See columns 5, 7, and 10 of “Calculation of Plant 1 Particulate Emissions” on page 5 of 5 of the PI-19 form at Tab 10 of the November 27, 2002 application supplement). This change decreases the Particulate Potential in column 14 from 24.79 tons to 17.91 tons (this will also reduce the Potential to emit after issuance from 0.50 tons/year to 0.36tons/year).
- (c) On Appendix A, page 3 of 13, the Potential VOC tons per year are calculated using existing paint VOC lb/gallon (in column 9). The source believes that the potential VOC emissions should be calculated at the regulatory limit of 3.5 lbs VOC/gallon of coating (minus water and exempt solvents). This change increases the calculated Potential VOC emissions (excluding cleaning solvent) shown in column 13 from 76.56 tons per year to 84.35 Tons per year. There is also an error in the weight of the cleaning solvent (MEK) on Appendix A, page 3 of 13. The actual weight of the MEK is 6.75 pounds/gallon (not the 7.24 used on Appendix A, page 3 of 13, or the 7.05 used in the November 27, 2002 Application Supplement). Correcting the weight of the MEK reduces the potential VOC from cleaning solvent from 20.96 tons per year to 19.54 tons per year. The total impact of these two changes is to increase the Plant 2 surface coating potential VOC emissions from 97.52 tons per year to 103.89 tons per year.
- (d) On Appendix A, page 4 of 13, the second note states: “All other Baking Enamels and cleaning solvents do not contain HAPs.” This is incorrect. The Plant 1 cleaning solvent is Xylene, which is a HAP. In addition, the “other baking enamels” are similar in composition to the paints included in the calculation. Since the volume of other baking enamels used equals 2.673% of the material included in the calculation, a way to correct this page is to increase the totals on Appendix A, page 4 of 13 by 2.673% and then add the xylene from the cleaning solvent. These calculations increase the xylene emissions from 16.11 tons to 20.32 tons; formaldehyde emissions from 0.54 tons to 0.55 tons; ethyl benzene emissions from 3.79 tons to 3.89 tons; methyl ethyl ketone emissions from 3.19 tons to 3.28 tons; and total combined HAPs emissions from 23.63 tons to 28.04 tons. *(Note: The “Total combined HAPs Emissions” column of the page 4 of 13 TSD Appendix A spreadsheet contains a formula error making the values in the last column incorrect. The correct values are 16.42, 3.44, 2.84, 0.93 and 23.76).*
- (e) On Appendix A, page 5 of 13, the second note states: “All other Epoxy paint and cleaning solvent do not contain HAPs.” This is incorrect. The Plant 2 cleaning solvent contains methyl ethyl ketone, which is a HAP. In addition, the “All Other Epoxy Part A ” is similar in composition to the Part A paints included in the calculation. Since the volume of other epoxy part A paints used equals 4.112% of the Part A paints included in the calculation, a way to correct this page is to increase the totals (excluding the 2-PKG Epoxy Converter Clear) on Appendix A, page 5 of 13 by 4.112% and then add the methyl ethyl ketone from the cleaning solvent. These calculations increase the xylene emissions from 34.18 tons to 34.76 tons; toluene emissions from 5.41 tons to 5.63 tons; methyl ethyl ketone emissions from 26.96 tons to 47.01 tons; and total combined HAPs emissions from 66.55 tons to 87.40 tons.

- (f) On Appendix A, page 6 of 13, the calculations of the "Flame Cutting" emissions are based upon overstated machine capabilities. For example, for the Oxy Burner, it is true that the maximum metal thickness cut for this machine is 1 inch and that the maximum speed is 230 inches per minute. However, the machine cannot achieve both of these specifications at the same time. It can go 20 inches per minute when cutting 1 inch thick material. At the maximum speed of 230 inches per minute, it can cut material up to 1/8" thick. The application potential to emit is calculated at the maximum metal removal rate, which for this machine is achieved while cutting 3/4" thick metal at 90 inches per minute for a combined 67.5 inches times inches. This is 29.348% of the capacity used on Appendix A, page 6 of 13 for the oxy burner emission calculations. For the Plasma, the same changes apply and for the laser, the difference is 17.5 inches times inches maximum capacity versus 90 used on Appendix A page 6 of 13 meaning that calculated emissions should be reduced to 19.444% of those calculated. Making these changes for the PM emissions would reduce the calculated plasma and oxy burner annual potential emissions to 0.42 tons per year each (versus 0.55 from the Title V permit application) and the Laser annual potential to emit to 0.009 tons per year (versus the 0.028 tons per year in the Title V application). Making these changes would reduce the total PM Potential to Emit from 4.44 tons per year to 2.40 tons per year.
- (g) On Appendix A, page 7 of 13, the calculations of the "Flame Cutting" emissions are based upon overstated machine capabilities. For example, for the Runway Burner, it is true that the maximum metal thickness cut for this machine is 1 inch and that the maximum speed is 160 inches per minute. However, the machine cannot achieve both of these specifications at the same time. It can go 40 inches per minute when cutting 1 inch thick material. At the maximum speed of 160 inches per minute, it can cut material up to 1/4" thick. The application potential to emit is calculated at the maximum metal removal rate, which for this machine is achieved while cutting 7/16" thick metal at 100 inches per minute for a combined 43.8 inches times inches. This is 27.375% of the capacity used on Appendix A page 7 of 13 for the runway burner emission calculations. For the low rise burner, the difference is 20 inches times inches maximum capacity versus 240 used on Appendix A page 7 of 13 meaning that calculated emissions should be reduced to 8.333% of those shown on Appendix A page 7 of 13 and for the rolling bridge burner, the difference is 52.5 inches times inches maximum capacity versus 275 used on Appendix A page 7 of 13 meaning that calculated emissions should be reduced to 19.091% of those shown on Appendix A page 7 of 13. Making these changes for the PM emissions would reduce the calculated runway burner annual potential emissions to 0.138 tons per year (versus 0.315 in the Title V permit application), the low rise burner annual potential emissions to 0.667 tons per year (versus 0.164 in the Title V permit application) and the rolling bridge burner annual potential to emit to 0.375 tons per year (versus the 0.431 tons per year in the Title V application). Making these changes would reduce the total PM Potential to Emit from 11.19 tons per year to 1.91 tons per year. *Note: It is unclear why the PM emission factor for the low rise burner on Appendix A page 7 of 13 is so much higher than for the other similar burners (or why the lb pollutant/1,000 inches cut, 1" thick) would not be a constant for each machine.*
- (h) On Appendix A page 10 of 13, the 40.4 MMBtu/hr total Heat Input Capacity used in the calculation exceeds the 38.4 MMBtu/hr total heat input capacity of all of the combustion sources shown on GSD 10a (pages 2 and 3 of 4). This would reduce the MMCF/yr from 353.9 to 336.4 and if the typical natural gas heat content of 1,020 Btu/cf is used, the total fuel use is reduced to 329.8 MMCF/yr. Also, due to the size of most of the units, they are more appropriately classified as residential furnaces (less than 300,000 Btu/hr) than small boilers (less than 10,000,000 Btu/hr). This would change the NOx emission factor from 100 to 94 and the CO emission factor from 84 to 40. Making these changes reduces the NOx emissions from 17.7 tons/year to 15.5 tons/year, the VOC emissions from 1.0 tons/year to 0.9 tons/year and the CO emissions from 14.9 tons/year to 6.6 tons/year.

- (i) There is no emission calculation for the three wash tanks (that are part of the two stage or three stage washers). Based upon actual 2001 chemical use and hours of operation, these tanks have a combined total actual emission of 2.17 tons of 2-Butoxyethanol (ethylene glycol butyl ether), which is both a HAP and a VOC. The potential emissions (based upon 8760 hours of operation for each wash tank) total 6.68 tons/year. These emissions are shown on page 2 of 3 of the GSD-07 form and page 2 of 2 of the GSD-08 form submitted with the November 27, 2002 application supplement.
- (j) Making all of these changes results in the following changes to page 1 of 13 of appendix A:
- (1) NO_x from Natural Gas Combustion is reduced from 17.7 to 15.5 tons/year. This reduces TOTAL NO_x emissions to 15.6 tons/year. This change applies to both the Uncontrolled and Controlled Potential Emissions.
 - (2) CO from Natural Gas Combustion is reduced from 14.9 to 6.6 tons/year. This reduces TOTAL CO emissions to 6.6 tons/year. This change applies to both the Uncontrolled and Controlled Potential Emissions.
 - (3) Uncontrolled PM from surface coating is reduced from 52.40 to 45.52 tons/year and controlled PM from surface coating is reduced from 1.05 to 0.91 tons per year.
 - (4) VOC from surface coating is increased from 163.65 to 181.98 tons per year. This change applies to both the Uncontrolled and Controlled Potential Emissions.
 - (5) The total HAPs from surface coating is increased from 90.18 to 115.44 tons per year. This change applies to both the Uncontrolled and Controlled Potential Emissions.
 - (6) The worst-case single HAP (xylene) from surface coating is increased from 50.29 to 55.08 tons/year. This change applies to both the Uncontrolled and Controlled Potential Emissions.
 - (7) The Welding & Cutting PM (&PM₁₀) emission is reduced from 15.63 tons/year to 4.31 tons/year (4.33 tons/year if the calculations from the November 27, 2002 application supplement are used). This change applies to both the Uncontrolled and Controlled Potential Emissions.
 - (8) A new column for Washers needs to be added. This column will show 6.68 tons of VOC and worst-case single HAP. This change applies to both the Uncontrolled and Controlled Potential Emissions.
 - (9) The TOTAL Uncontrolled Potential PM emissions are reduced from 75.8 tons/year to 57.65 tons/year.
 - (10) The TOTAL Uncontrolled Potential PM₁₀ emissions are changed from 17.0 tons/year to 58.63 tons/year. *(Note: This value is based upon the conservative assumption that all of the PM emissions from the shot blasting and surface coating are also PM₁₀ emissions which is consistent with the "Potential to Emit After Issuance" table in the TSD. The source is not aware of any information that would support or contradict this assumption).*
 - (11) The TOTAL Uncontrolled Potential VOC emissions are increased from 164.7 tons/year to 189.57 tons/year. This change applies to both the Uncontrolled and Controlled Potential Emissions.
 - (12) The TOTAL Uncontrolled HAP emissions are increased from 90.6 tons/year to 122.76 tons/year. This change applies to both the Uncontrolled and Controlled Potential Emissions.
 - (13) The TOTAL worst-case single HAP should be changed from 50.9 tons/year to 55.08 tons/year. (This value is based upon xylene—it is not appropriate to add together different HAPs to arrive at this total). This change applies to both the Uncontrolled and Controlled Potential Emissions.
 - (14) The TOTAL Controlled Potential PM emissions are reduced from 17.3 tons/year to 13.04 tons/year.
 - (15) The TOTAL Controlled Potential PM₁₀ emissions are increased from 1.4 tons/year to 14.02 tons/year. *(Note: Surface Coating, Shot Blasting, and Welding and cutting emissions were not included on the original Controlled Potential PM₁₀ emissions calculation).*

(k) The following conforming changes need to be made to the **Potential to Emit After Issuance**

Table:

- (1) Baking Enamel Paint PM and PM-10 emissions are reduced from 0.50 ton/year to 0.36 tons/year.
- (2) Baking Enamel Paint Booth VOC emissions are increased from 66.13 tons/year to 77.67 tons/year.
- (3) Baking Enamel Paint Booth Any Single HAP emissions are increased from 16.11 tons/year to 20.32 tons/year.
- (4) Baking Enamel Paint Booth Total HAPs emissions are increased from 20.55 tons/year to 28.04 tons/year.
- (5) Epoxy Paint Booth VOC emissions are increased from 97.52 tons/year to 103.89 tons/year.
- (6) Epoxy Paint Booth Xylene emissions are increased from 34.18 tons/year to 34.76 tons/year and MEK emissions are increased from 26.96 tons/year to 47.01 tons/year.
- (7) Epoxy Paint Booth Total HAPs emissions are increased from 66.55 tons/year to 87.40 tons/year.
- (8) Welding & Cutting PM and PM-10 emissions are decreased from 15.63 tons/year to 4.31 tons/year.
- (9) Natural Gas CO emissions are reduced from 14.9 tons/year to 6.6 tons/year.
- (10) Natural Gas NOx emissions are reduced from 17.7 tons/year to 15.5 tons/year.
- (11) A new row must be added for "Washers" with VOC and HAP emissions of 6.68 tons/year. The HAP is "glycol ethers."
- (12) Total PM emissions are decreased from 24.85 tons/year to 13.04 tons/year.
- (13) Total PM10 emissions are decreased from 25.48 tons/year to 14.02 tons/year.
- (14) Total VOC emissions are increased from 164.66 tons/year to 189.57 tons/year.
- (15) Total CO emissions are decreased from 14.91 tons/year to 6.61 tons/year.
- (16) Total NOx emissions are decreased from 17.79 tons/year to 15.59 tons/year.
- (17) Total Xylene emissions are increased from 50.29 to ns/year to 55.08 tons/year.
- (18) Total HAPs emissions are increased from 87.67 tons/year to 122.76 tons/year.

Response to Comment 6

Response to Comment 6(a): The potential VOC tons per year on page 2 of 13 of Appendix A was calculated using IDEM standard guidelines for such VOC emission calculations. It is not in practice to use the regulatory limit of 3.5 lbs VOC/gallon to calculate the Potential to Emit (VOC). Therefore, the requested change cannot be implemented. The emission calculation on page 2 of 13 of Appendix A remains the same.

Response to Comment 6(b): The Particulate potential to emit (column 14) was calculated using appropriate transfer efficiencies information from the source and based on EPA guideline. The calculation of potential particulate emission does assume that exempt solvents or any solvents are particulate. The solvents contribute nothing to the calculated potential particulate emission as indicated by the transfer efficiency of 100% used for the solvents. The method used for calculation is accurate for the applicable process. Therefore, the requested changes cannot be implemented. The emission calculation on page 2 of 13 of Appendix A remains the same.

Response to Comment 6(c): The potential VOC tons per year on page 3 of 13 of Appendix A was calculated using IDEM standard guidelines for such VOC emission calculations. It is not in practice to use the regulatory limit of 3.5 lbs VOC/gallon to calculate the Potential to Emit (VOC) since different processes have different maximum capacities. A method that uses the maximum usage of materials will be more accurate representative of the potential VOC emissions rather than the regulatory limit. Therefore, the requested change for the VOC emission will not be implemented. However, based on the error indicated in Comment 10(c), the density of the cleaning solvent has been changed from **7.24** pounds per gallon to **6.75** pounds per gallon. The overall total potential VOC emission is now **96.10** tons per year.

Response to Comment 6(d): The statement "All other Baking Enamels and cleaning solvents do not

contain HAPs” has been removed as requested. The HAP emission calculations have been revised to reflected the corrections as explained in Comment 10(d) above. The revised HAP emission calculation on page 4 of 13 of Appendix A is attached to this TSD addendum

Response to Comment 6(e): The statement “All other Epoxy paint and cleaning solvent do not contain HAPs” has been removed as requested. The HAP emission calculations have been revised to reflected the corrections as explained in Comment 10(d) above. The revised HAP emission calculation on page 5 of 13 of Appendix A is attached to this TSD addendum.

Response to Comment 6(f): IDEM, OAQ agrees that emissions calculations be amended as requested. The emissions calculations in page 6 of 13 have been changed and attached to this TSD addendum.

Response to Comment 6(g): IDEM, OAQ agrees that emissions calculations be amended as requested. The emissions calculations in page 7 of 13 have been changed and attached to this TSD addendum.

Response to Comment 6(h): The natural gas combustion emissions calculations on page 10 of 13 of the Appendix A have been changed accordingly. The revised emissions calculations page is attached to this TSD addendum.

Response to Comment 6(i): The emission calculation for the three wash tanks presented is noted and would be added to the total HAP and VOC emissions for the source.

Response to Comment 6(j): Necessary changes have been made to “Summary of Emissions Calculations” presented on page 1 of 13 of Appendix A. The revised copy of this summary of emissions calculations is attached to this TSD addendum.

Response to Comment 6(k): The revised Potential to Emit After Issuance Table based on the changes following the comments 10 (a) to 10 (j) is shown below:

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Any Single HAP	Total HAPs
Baking Enamel Paint Booth	0.50	0.50	0.00	87.40	0.00	0.00	20.32 (Xylene)	28.04
Epoxy Paint Booth	0.55	0.55	0.00	97.52	0.00	0.00	34.76 (Xylene) 26.96 (MEK)	87.67
Shot Blasters	7.40	7.40	0.00	0.00	0.00	0.00	0.00	0.00
Welding & Cutting Emissions (6 units)	4.31	4.31	0.00	0.00	0.00	0.00	0.14 (Mn)	0.15
Waste Oil Combustion	0.12	0.10	0.19	0.01	0.01	0.09	0.15(Pb)	0.20
Tank Washers	0.0	0.0	0.0	0.0	0.0	0.0	6.68	6.68
Natural Gas Combustion (49 units)	0.3	1.3	0.1	1.0	6.6	15.5	0.32(Hexane)	0.33
Total Emissions	13.18	14.16	0.29	185.93	6.61	15.59	55.08 (Xylene)	123.1

Comment 7

State Rule Applicability - Entire Source:

- (a) The Preventive Maintenance Plan description should be modified as follows:
- (1) Remove the "a" between "submitted" and "Preventative".
 - (2) Change "Plan" to "Plans"
 - (3) Add "for the shot blasters identified as EU 1-1 and EU 2-1" between "(PMP)" and "on".
 - (4) Change "This PMP has " to "These PMPs have"
- (b) The Emission Reporting section should be modified as follows:
- (1) In the third line remove the word "annually."
 - (2) In the third line replace the word "annual" with "emission"
 - (3) In the fourth line, remove "of each year."

Response to Comment 7

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

IDEM, OAQ agrees that the TSD should have read as follows:

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted Preventive Maintenance Plans (PMPs) **for the shot blasters identified as EU 1-1 and EU 2-1** on December 2, 2002. **These PMPs have** been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

Comment 8

Compliance Requirement:

The shotblasters (EU 1-1 and EU 2-1) compliance monitoring conditions at (b) should be removed for the following reasons:

- (1) These conditions are not in the proposed permit
- (2) There is no stack on EU 1-1 (it exhausts back inside of the building in a location where it is difficult to observe).
- (3) There is a stack on EU 2-1, but due to its short height and location towards the middle of the roof, it cannot be observed from the ground.
- (4) The shotblasters are maintained by following the PMP that was submitted with the November 27, 2002 application supplement.

Response to comment 8

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

IDEM, OAQ agrees that the TSD should have read as follows:

Response to Comment 13: IDEM, OAQ agrees that the shotblasters (EU 1-1 and EU 2-1) compliance monitoring conditions (Compliance Requirements (b)) on the TSD should be removed for the reasons in Comment 13 (b) . There fore the conditions are hereby removed from the TSD with striveout lines indicating deletion as follows:

- (b) ~~The shotblasters (EU 1-1 and EU 1-2) have applicable compliance monitoring conditions as specified below:~~
- ~~(1) Daily visible emission notations of the two (2) shotblasting units stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
 - ~~(2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
 - ~~(3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
 - ~~(4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
 - ~~(5) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).~~

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Rotary Lift
Source Location: 2700 Lanier Drive, Madison, Indiana 47250
County: JEFFERSON
SIC Code: 3534
Operation Permit No.: T077-7652-00011
Permit Reviewer: Femi Ogunsola/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Rotary Lift relating to the operation of two automotive hydraulic lift manufacturing plants.

History

On December 13, 1996, Rotary Lift submitted an application for a Part 70 (Title V) Operating Permit to the OAQ. The application was determined to be administratively complete under the requirements for operation. It was found after technical reviews, that Rotary Lift was non-compliant with 326 IAC 8-2-9. A Notice of Deficiency was sent to Rotary Lift in July 2001. Subsequently, Rotary Lift sent a Title V application supplement on December 2, 2002.

Source Definition

This automotive hydraulic lift manufacturing company consists of two (2) plants (Plant 1 and Plant 2). Both plants are located at 2700 Lanier Drive, Madison, IN 47250.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Three (3) Wash Tanks, each of which is the 1st stage of either a 3 stage washer. The wash tank identified as EU 1-3 installed in 1996 is part of a 3 stage washer, and the wash tanks identified as EU 2-3 installed in 1996 and EU 2-4 installed in 1997 are each part of separate 2 stage washers. The three (3) Wash Tanks (EU 1-3, 2-3 and 2-4) have a combined maximum capacity of 2.5 tons steel per hour, and exhausting to stacks (S/V 1-4, 2-15 and 2-2 respectively).
- (b) One (1) Wet Paint Line consisting of one (1) Baking Enamel Paint Booth, identified as EU 1-2, installed in 1985, with a nominal capacity of 5 gallons per hour, using dry filters as particulate control exhausting to two (2) stacks (S/V 1-19 and 1-20).
- (c) One (1) Epoxy Paint Line consisting of one (1) Epoxy Paint Booth, identified as (EU 2-2), installed in 1988, with a nominal capacity of 6 gallons per hour, using dry filters as particulate control, and exhausting to three (3) stacks (S/V 2-9 thru 2-11).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) The following facilities with potential emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM_{10}) less than five (5) pounds per hour as defined in 326 IAC 2-7-1(21)(B):
 - (1) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 1-1), with a nominal capacity of 6,000 pounds of steel and 30 pounds of Steel Shot per hour.
 - (2) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 2-1), with a nominal capacity of 6,000 pounds of steel and 50 pounds of Steel Shot per hour, with dry filter particulate control and exhausting to stack (S/V 2-8).
- (b) One (1) natural gas fired long Curing/Drying Oven with a cooling area for the Wet Paint Line, with a maximum capacity of 3.2 million BTU per hour and exhausting to two (2) stacks (S/V 1-9 and S/V 1-48).
- (c) One (1) natural gas fired long Curing/Drying Oven with a cooling area for the Epoxy Paint Line, with a maximum capacity of 4.0 million BTU per hour and exhausting to two (2) stacks (S/V 2-4 and S/V 2-1).
- (d) One (1) Used Oil Furnace Clean Burn, identified as Model CB-90 AH, with a maximum capacity of 185,000 BTU per hour.
- (e) Natural gas heaters with propane back-up with maximum capacities as listed below:
 - (1) One (1) heater with a maximum capacity of 60,000 BTU per hour
 - (2) Two (2) heaters each with a maximum capacity of 74,000 BTU per hour
 - (3) One (1) heater with a maximum capacity of 75,000 BTU per hour
 - (4) Fifteen (15) heaters each with a maximum capacity of 80,000 BTU per hour
 - (5) Two (2) heaters each with a maximum capacity of 100,000 BTU per hour
 - (6) One (1) heater with a maximum capacity of 115,000 BTU per hour
 - (7) One (1) heater with a maximum capacity of 120,000 BTU per hour
 - (8) Three (3) heaters each with a maximum capacity of 125,000 BTU per hour
 - (9) Two (2) heaters each with a maximum capacity of 145,000 BTU per hour
 - (10) Four (4) heaters each with a maximum capacity of 180,000 BTU per hour
 - (11) Two (2) heaters each with a maximum capacity of 205,000 BTU per hour
 - (12) One (1) heater with a maximum capacity of 250,000 BTU per hour
 - (13) One (1) heater with a maximum capacity of 260,000 BTU per hour
 - (14) Three (3) heaters each with a maximum capacity of 950,000 BTU per hour
 - (15) One (1) heater with a maximum capacity of 1,250,000 BTU per hour
 - (16) One (1) heater with a maximum capacity of 1,500,000 BTU per hour
 - (17) Two (2) heaters each with a maximum capacity of 2,500,000 BTU per hour
 - (18) Four (4) heaters each with a maximum capacity of 3,400,000 BTU per hour
 - (19) Two (2) heaters each with a maximum capacity of 5,000,000 BTU per hour
- (f) One Hundred and Ten (108) Electric Arc Welders. Plant 1 has 70 stations with the actual average hourly consumption of 0.98 pounds per station equivalent to 68.6 pounds per hour. Plant 2 has 38 stations with actual average hourly consumption of 0.84 pounds per station which equivalent to 31.9 pounds per hour.

- (g) Five (5) Burners (Cutting torches).
- (h) Four (4) electric powered Powder Paint Infrared Curing ovens (two (2) in Plant 1 and two (2) in Plant 2) [326 IAC 2-7-1 (21) (G) (vi) (GG)].
- (i) A number of vessels storing lubricating oils, used oil, hydraulic oils, machining oils, etc.(326 IAC 2-7-1(21) (G)(iii)(BB)) including the following:
 - (1) Vessels located in Building H:
 - (A) 275-Gallon Diesel Tank;
 - (B) Used Oil Tank 1 in South Section (500 Gallons);
 - (C) Used Oil Tank 2 in South Section (500 Gallons);
 - (D) Used Oil Tank in Center Section (350 Gallons); and
 - (E) 55-Gallon Drums containing Used Oil (number on hand varies from 0 to less than 10)
 - (2) RP-25 Oil Tank (125 Gallons) located in Building F.
 - (3) 275-Gallon Used Oil Tank for Used Oil Furnace located in Building J.
 - (4) Vessels located in Building A:
 - (A) Six 55-Gallon Oil Dispensing Drums; and
 - (B) Okuma Machine (OP 2525) (165 Gallons of water-coolant mixture).
- (j) Application of Oil Coating in Dip Tank [326 IAC 2-7-1 (21) (G) (vi) (AA)].
- (k) Machining operations include a number of machines with different names, but all of them consist of one or more of the following: Saws, lathes, drills or mills (mills are like wood planes for metal). The material being machined is steel and an aqueous cutting coolant continuously floods the machining interface (326 IAC 2-7-1 (21) (G)(vi)(BB)).
- (l) Degreasing operations that do not exceed 145 gallons per 12 months consisting of degreaser which is a standard parts washer, a cold cleaner [326 IAC 2-7-1 (21) G (vi) (CC)].
- (m) The following activities have been identified by source as trivial activities:
 - (12) Four (4) closed non-vented Rotary Tumblers (two (2) located in Plant 1 and two (2) located in Plant 2) used for cleaning or deburring metal products without abrasive blasting.
 - (13) Two (2) Powder Paint Booths located at Plant 1
 - (14) Two (2) Powder Paint Booths located at Plant 2
 - (15) One (1) Assembly Operation, identified as EU 36, and associated with the Arm Cell process is the last step before shipping. This may include bolting parts together, putting parts into shipping containers and banding the various shipping containers together to prepare a specific model of the product for shipment
 - (16) Two (2) Excess Shot removal operations associated with the two (2) shotblasters (EU 1-1 and EU 2-1 respectively) are used to blow any remaining shot residue off of the cleaned parts using compressed air before they are painted.
 - (17) Six (6) Final Assembly consist of packaging the various parts needed to make a final product for shipping. This may include bolting parts together, putting parts into shipping containers and banding the various shipping containers together to prepare a specific model of the product for shipment.

(18) One (1) Cincinnati Laser

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) OP 39-01-83-0035, issued on February 28, 1979;
- (b) OP 39-01-83-0038, issued on May 25, 1979;
- (c) OP 39-01-87-0052, issued on February 15, 1983;
- (d) OP 39-01-91-0065, issued on May 27, 1987; and
- (e) Registration for Construction and Operation Status issued on July 7, 1988.

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

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

- (f) OP-39-01-83-0035, issued on February 28, 1979.

All conditions are not incorporated.

Reason not incorporated: OP-39-01-83-0035 was voided and replaced by OP 39-01-83-0038.

Air Pollution Control Justification as an Integral Part of the Process

"The company has submitted the following justification for the baghouse that uses cartridge filters be considered as an integral part of the Plant 1 Descaler (Shot Blaster) (EU1-1), and the Plant 2 Shot Blaster (EU2-1):

- (a) The shotblast machines use steel shots as media for cleaning the parts for further machining, painting, or other processing. In all cases, a part free from fines is essential to quality in the process. The baghouse system evacuates the fines (from spent shot and scales removed from the parts) which would otherwise decrease the efficiency of the system by reducing the mass of the shot being thrown at the parts and by interfering with the contact of clean shot with the part surface. Operation of the shotblast system without the baghouse would result in parts that do not meet the necessary standards for use in the subsequent operation.
- (b) The baghouses are necessary for the recycling of the shotblast media. The systems are designed for such recycling to take place and could not be operated otherwise. The recycling is performed because of the large rate of shot through the system. If shot were not recycled, the system would run out of shot in less than one minute. Shot would need to be put into the system almost continuously if there were no recycle. This would result in the use of approximately 100,000 tons per year of shot. Rotary Lift currently uses less than one drum of shot every week at each shot blaster. The steel shot costs over \$100/ton to replace. Therefore, the reuse of shot results in significant cost savings.
- (c) The baghouse protects the fan that creates the draft from the working surface. Without the baghouse cartridge filter, particulate would directly impact the fan blades and degrade them to the point where the draft required to evacuate the fines generated by the shot blast operation would not be achieved and damaged shot would not be eliminated. If the damaged shot is not removed, it reduces the efficiency of the blast unit.

- This would result in part quality that would not be accepted by the customer.
- (d) The baghouse systems are interlocked with the shotblasting operation. The system is programmed to require that the baghouse system be activated for the shotblasting operation to start. Further, the system would have to be completely re-wired and reprogrammed to override the interlock.
 - (e) Baghouses have been included in shot blaster design long before environmental regulations. A Wheelabrator Co. catalog dating back to 1940 has been found showing shot blasters with baghouses. Use of baghouses decades before the Clean Air Act was in place demonstrates that the primary purposes of the baghouses were process considerations and not air pollution control. This also demonstrates that baghouses would be used even if no air pollution control laws applied.
 - (f) Daily, and quarterly inspections are performed on the baghouses. The daily inspections include inspecting the baghouse doors, seals, and discharge tubes from the hopper to the collection drums located below the dust collector, checking the fan, and baghouse pressure drop. Rotary Lift's maintenance crew enter the dust collector on a quarterly basis to inspect the condition of the cartridge filters. The manometer used to monitor the pressure drop is also checked. The following items are also inspected quarterly: the collector housing, cleaning system, material discharge system, fan, and airflow rates.

IDEM, OAQ has evaluated the above justifications and agreed that the baghouse system using cartridge filters will be considered as an integral part of the Plant 1 Descaler (Shot Blaster) (EU1-1), and Plant 2 Shot Blaster (EU2-1). Therefore, the permitting level will be determined using the potential to emit after the cartridge filters. Operating conditions in the proposed permit will specify that the baghouse using cartridge filters shall operate at all times when Plant 1 Descaler (Shot Blaster) (EU1-1), and Plant 2 Shot Blaster (EU2-1) are in operation.

Enforcement Issue

- (a) IDEM is aware that the coatings previously used in the paint booths were not in compliance with the following emission limitation:
 - (1) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the in ground and above ground automobile lifts shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

However, based on the information provided by Rotary Lift recently, evidence showed that Rotary Lift came into compliance with 326 IAC 8-2-9 in June 2002.

- (g) IDEM is reviewing this matter and will take appropriate action. Since the source has come into compliance with 326 IAC 8-2-9, the enforcement issue is currently being resolved.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information was received on November 3, 1998 and December 2, 2002.

A notice of completeness letter was mailed to the source on December 23, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 13)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 25
VOC	greater than 100, less than 250
CO	less than 25
NO _x	less than 25

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	greater than 10
Formaldehyde	less than 10
Toluene	less than 10
Ethyl Benzene	less than 10
Methyl Ethyl Ketone	greater than 10
Hexane	less than 10
Lead	less than 10
Manganese	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM [#]	no data
PM-10	2.85
SO ₂ [#]	no data
VOC	54.19
CO [#]	no data
NO _x [#]	no data

Data not reported by the applicant

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Any Single HAP	Total HAPs
Baking Enamel Paint Booth	0.50	0.50	0.00	66.13	0.00	0.00	16.11 (Xylene)	20.44
Epoxy Paint Booth	0.55	0.55	0.00	97.52	0.00	0.00	34.18 (Xylene) 26.96 (MEK)	66.55
Shot Blasters	7.40	7.40	0.00	0.00	0.00	0.00	0.00	0.00
Welding & Cutting Emissions (6 units)	15.63	15.63	0.00	0.00	0.00	0.00	0.14 (Mn)	0.15
Waste Oil Combustion	0.12	0.10	0.19	0.01	0.01	0.09	0.15(Pb)	0.20
Natural Gas Combustion (49 units)	0.3	1.3	0.1	1.0	14.9	17.7	0.32(Hexane)	0.33
Total Emissions	24.85	25.48	0.29	164.66	14.91	17.79	50.29 (Xylene)	87.67

County Attainment Status

The source is located in Jefferson County.

Pollutant	Status
PM-10	attainment
SO ₂	unclassifiable
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jefferson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Jefferson County has been classified as attainment or unclassifiable for PM-10, SO₂, NO_x, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are no longer applicable to this source since the source is now subject to the National Emission Standards for Hazardous Air Pollutants, [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901] as discussed below.
- (c) This source is subject to the National Emission Standards for Hazardous Air Pollutants, [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901] General Provisions Relating to HAPs, because it is a major source of HAPs from metal coating operations. Therefore, the followings conditions applies:
 - (1) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.
 - (2) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

This source is subject to National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M MMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980] with the following conditions:

- (1) The provisions of 40 CFR Part 63, Subpart M MMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart M MMM.
- (2) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

- (1) All coating operations as defined in 40 CFR 63.3981;
- (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

Pursuant to 40 CFR 63.3910 (Notification Requirements), the source shall comply with the following notification requirements:

- (1) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (2) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart M MMM.
- (3) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

Pursuant to 326 IAC 2-7-12 and 326 IAC 2-7-5 (Requirement to Submit a Significant Permit Modification Application), the Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (1) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart M, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (2) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart M.
- (3) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(d) This source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring. In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant;
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard, and
- (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 percent of the amount required for a source to be classified as a major source.

For this source, no unit has potential pre-control emissions of a regulated air pollutant that are equal or greater than 100 tons per year. Therefore, 40 CFR 64 is not applicable.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 2, 2002. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

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

The source wide potential to emit, after control, of any regulated pollutant is less than 250 tons per year and the source is not one of the 28 listed source categories. Therefore, 326 IAC 2-2 is not applicable and the source is not a PSD major source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

326 IAC 6-4 (Fugitive Dust Emissions)

The source shall comply with the fugitive dust limitations outlined in 326 IAC 6-4-1 (Fugitive Dust Emissions). Fugitive dust emissions shall not be visible crossing the boundary or property line of the plant.

State Rule Applicability - Individual Facilities

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the one (1) Wet Paint (Baking Enamel) Booth (identified as EU 1-2) and one (1) Epoxy Paint Booth (identified as EU 2-2) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS recently (December 2, 2002) submitted by the source and calculations made by IDEM, both spray booths are in compliance with this requirement by using only coatings that comply with the VOC emission limit.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from the two (2) paint spray booths shall be limited by the following:

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

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

Under the rule 326 IAC 6-3-2 revision of June 12, 2002, particulate from the surface coating operations shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

The dry particulate filters shall be in place at all times the surface coating booths are in operation, in order to comply with this limit.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from the three (3) stage washer tanks (EU 1-3, EU 2-3 and EU 2-4) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

The dry particulate filters shall be in place at all times the three (3) stage washer tanks are in operation, in order to comply with this limit. The Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-2, the particulate from the shotblasters identified as EU 1-1 and EU 1-2 respectively, shall be limited to 0.25 pounds per hour and 0.35 pounds per hour respectively, when operating at a process weight rate of 30 pounds per hour and 50 pounds per hour respectively. These limits are determined using the following equation:

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

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

The particulate matter cartridge filter shall be in place at all times the shotblasters are in operation, in order to comply with these limits.

(b) Pursuant to 326 IAC 6-3-2, the particulate from the welding activities with 70 stations located in Plant 1 and 38 stations located in Plant 2 shall be limited to 0.43 pounds per hour and 0.26 pounds per hour respectively when operating at a process weight rate of 68.6 pounds per hour and 31.9 pounds per hour respectively. These limits are determined using the following equation:

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

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

326 IAC 8-1-6 (General Reduction Requirements)

326 IAC 8-1-6 (General Reduction Requirements) does not apply because the surface coating facilities are subject to other provisions of article 8 (326 IAC 8-2-9).

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This rule applies to stationary vessels used to store volatile organic liquid (VOL) that are located in Clark, Floyd, Lake or Porter County. Since the storage vessels at this source are located in Jefferson County this rule does not apply. Moreover, 326 IAC 8-9-2 exempts vessels with a design capacity of less than or equal to four hundred twenty thousand (420, 000) gallons used for petroleum or condensate stored, processed or treated prior to custody transfer. The total capacity of storage vessels at this source is less than four hundred twenty thousand (420, 000) gallons. Therefore, pursuant to 326 IAC 8-9-2 the storage vessels at this source are exempted from the requirements of 326 IAC 8-9.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

- (a) The surface coating booths source-wide (two (2) specified as one (1) Baking Enamel Paint Booth (EU1-2) and one (1) Epoxy Paint Booth (EU 2-2)) have applicable compliance monitoring conditions as specified below:
 - (1) The dry filters shall be in place at all times the surface coating booths source- wide are (two (2) specified as one (1) Baking Enamel Paint Booth (EU1-2) and one (1) Epoxy Paint Booth (EU 2-2)) in operation, in order to comply with this limit.
 - (2) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booths stacks (S/V 1-19 and 1-20 for Baking Enamel Booth and S/V 2-9 thru 2-11 for Epoxy Paint Booth) while one or both of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (3) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the surface coating booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (b) The shotblasters (EU 1-1 and EU 1-2) have applicable compliance monitoring conditions as specified below:
 - (1) Daily visible emission notations of the two (2) shotblasting units stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (5) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this automotive hydraulic lift manufacturing company shall be subject to the conditions of the attached proposed **Part 70 Permit No. T077-7652-00011**.

Appendix A: Emission Calculations

Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Title V: 077-7652
Plt ID: 077-00011
Reviewer: Femi Ogunsola/ EVP
Date: 6/10/2003

Uncontrolled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Waste (Used) Oil Combustion	Natural Gas Combustion	Surface Coating Plant 1 & Plant 2	Welding & Cutting Plant 1 & Plant 2	Shot Blasting Plant 1 & Plant 2	Tank Washers	TOTAL
PM	0.12	0.30	52.40	4.31	7.40	0.00	64.5
PM10	0.10	1.30	0.00	4.31	7.40	0.00	13.1
SO2	0.19	0.10	0.00	0.00	0.00	0.00	0.3
NOx	0.09	15.50	0.00	0.00	0.00	0.00	15.6
VOC	0.01	1.00	163.65	0.00	0.00	6.68	171.3
CO	0.01	6.60	0.00	0.00	0.00	0.00	6.6
total HAPs	0.16	0.33	115.44	0.15	0.00	6.68	122.8
worst case single HAP	0.15	0.32	55.08	0.14	0.00	6.68	62.4
Total emissions based on rated capacity at 8,760 hours/year.							
Controlled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Waste (Used) Oil Combustion	Natural Gas Combustion	Surface Coating Plant 1 & 2	Welding & Cutting Plant 1 & Plant 2	Shot Blasting Plant 1 & Plant 2	Tank Washers	TOTAL
PM	0.12	0.30	52.40	4.31	7.40	0.00	64.5
PM10	0.10	1.30	0.00	4.31	7.40	0.00	13.1
SO2	0.19	0.10	0.00	0.00	0.00	0.00	0.3
NOx	0.09	15.50	0.00	0.00	0.00	0.00	15.6
VOC	0.01	1.00	163.65	0.00	0.00	6.68	164.7
CO	0.01	6.60	0.00	0.00	0.00	0.00	6.6
total HAPs	0.16	0.33	115.44	0.15	0.00	6.68	116.1
worst case single HAP	0.15	0.32	55.08	0.14	0.00	6.68	55.7
Total emissions based on rated capacity at 8,760 hours/year, after control.							

**Appendix A: Emissions Calculations
VOC and Particulate**

From Surface Coating Operations

Plant 1: Wet Paint Line

Company Name: Rotary Lift

Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250

Title V: 077-7652

Plt ID: 077-00011

Reviewer: Femi Ogunsola/EVP

Date: 6/10/2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics) *	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat per hour (gal/hr) **	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Blue Baking Enamel	8.77	32.68%	0.0%	32.68%	0.0%	41.07%	3.295	2.87	2.87	9.44	226.64	41.36	17.04	6.98	80%
Red Baking Enamel	8.65	37.66%	0.0%	37.66%	0.0%	38.10%	0.780	3.26	3.26	2.54	60.98	11.13	3.68	8.55	80%
Yellow L/F Baking Enamel	9.69	31.17%	0.0%	31.17%	0.0%	43.70%	0.433	3.02	3.02	1.31	31.39	5.73	2.53	6.91	80%
Black Baking Enamel	8.62	33.49%	0.0%	33.49%	0.0%	41.02%	0.186	2.89	2.89	0.54	12.88	2.35	0.93	7.03	80%
All Other Baked Enamels	8.70	37.00%	0.0%	37.00%	0.0%	41.00%	0.126	3.22	3.22	0.41	9.73	1.78	0.60	7.85	80%
Cleaning Solvent	7.25	100.00%	0.0%	100.00%	0.0%	0.00%	0.119	7.25	7.25	0.86	20.71	3.78	0.00		100%

State Potential Emissions

Add worst case coating to all solvents

15.10

362.33

66.13

24.79

METHODOLOGY

Controlled PM Emission (based on 98% control efficiency of dry filters) : 0.50

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

* The pounds of VOC per gallon of coating (less water) used in these calculations are less than those shown on the attached Marcus Paint Company MSDS sheets.

The reason for this is that the Marcus Paint Company calculates the VOC content of its paint as if the exempt solvents

(Methyl Acetate and P-Chlorobenzotrifluoride) are not part of the formulation (like water is normally treated). The Indiana Regulations

applicable to Rotary Lift (326-IAC-8-2-9) are as delivered to a coating applicator.* Therefore, Rotary Lift calculates all Marcus Paint Company

coating volatile organic compound values as follows: (Wt/gallon)*(Volatile Wt. % - Exempt Solvent Wt%) = lb VOC/gallon

** The parts coated on Rotary Lift's paint lines range in size from 6 inches square to over 20 feet long.

These are parts of different models of a dozen types of lifts. All of these parts are required to make the finished products.

Therefore, taking the gallons needed to coat the biggest part and multiplying that value by maximum number of the smallest

parts that could be painted in an hour gives an answer that is physically impossible to achieve. The best way to do these calculations

is on gallons of paints applied per hour. The highest annual value from year 1997 to 2001 production records were used. It is not possible to calculate

a meaningful maximum due to the diversity of parts coated.

**Appendix A: Emissions Calculations
VOC and Particulate**

From Surface Coating Operations
Plant 2: Epoxy Paint Line

Company Name: Rotary Lift

Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250

Title V: 077-7652

Plt ID: 077-00011

Reviewer: Femi Ogunsola/EVP

Date: 6/10/2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat per hour (gal/hr) *	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Blue Epoxy Part A	9.68	30.142%	0.0%	30.14%	0.0%	58.60%	1.631	2.92	2.92	4.76	114.23	20.85	9.66	4.98	80%
Red Epoxy Part A	9.43	32.196%	0.0%	32.20%	0.0%	56.90%	0.690	3.04	3.04	2.09	50.26	9.17	3.86	5.33	80%
Yellow Epoxy Part A	10.95	23.269%	0.0%	23.27%	0.0%	59.80%	0.137	2.55	2.55	0.35	8.38	1.53	1.01	4.26	80%
Black Epoxy Part A	9.52	30.680%	0.0%	30.68%	0.0%	58.50%	0.184	2.92	2.92	0.54	12.91	2.36	1.06	4.99	80%
All Other Epoxy Part A	9.00	33.330%	0.0%	33.33%	0.0%	58.00%	0.109	3.00	3.00	0.33	7.82	1.43	0.57	5.17	80%
Epoxy Converter Part B	8.17	41.875%	0.0%	41.88%	0.0%	51.00%	2.751	3.42	3.42	9.41	225.88	41.22	11.44	6.71	80%
Cleaning Solvent	6.75	100.000%	0.0%	100.00%	0.0%	0.00%	0.661	6.75	6.75	4.46	107.09	19.54	0.00		100%

State Potential Emissions

Add worst case coating to all solvents

21.94

526.57

96.10

27.61

METHODOLOGY

Controlled PM Emission (based on 98% control efficiency of dry filters) =

0.55

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

* The parts coated on Rotary Lift's paint lines range in size from 6 inches square to over 20 feet long.

These are of parts different models of a dozen types of lifts. All of these parts are required to make the finished products.

Therefore, taking the gallons needed to coat the biggest part and multiplying that value by maximum number of the smallest

parts that could be painted in an hour gives an answer that is physically impossible to achieve. The best way to do these calculations

is on gallons of paints applied per hour. The highest annual value from year 1997 to 2001 production records were used. It is not possible to calculate

a meaningful maximum due to the diversity of parts coated.

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

**Company Name: Rotary Lift
Plant 1: Wet Paint Line
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Title V: 077-7652
Pit ID: 077-00011
Permit Reviewer: Femi Ogunsola/EVP
Date: 6/10/2003**

Material	Density (Lb/Gal)	Gal of Mat per hour (gal/hour)*	Weight % Xylene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Methyl Ethyl Ketone	Xylene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Total Combined HAPs Emissions (ton/yr)
Blue Baking Enamel	8.77	3.294952	8.86%	0.30%	2.09%	1.72%	11.51	0.39	2.72	2.24	16.85
Red Baking Enamel	8.65	0.780048	7.79%	0.30%	1.82%	1.74%	2.36	0.09	0.55	0.53	3.54
Yellow L/F Baking Enamel	9.69	0.432692	10.64%	0.30%	2.51%	2.02%	2.01	0.06	0.47	0.38	2.92
Black Baking Enamel	8.615	0.186298	9.08%	0.30%	2.14%	1.77%	0.66	0.02	0.15	0.13	0.96
Cleaning Solvent	7.25	0.119000	100.00%	0.00%	0.00%	0.00%	3.78	0.00	0.00	0.00	0.00

Total State Potential Emissions **20.32 0.56 3.90 3.27 24.27**

METHODOLOGY

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

* The parts coated on Rotary Lift's paint lines range in size from 6 inches square to over 20 feet long. These are parts of different models of a dozen types of lifts. All of these parts are required to make the finished products. Therefore, taking the gallons needed to coat the biggest part and multiplying that value by maximum number of the smallest parts that could be painted in an hour gives an answer that is physically impossible to achieve. The best way to do these calculations is on gallons of paints applied per hour. The highest annual value from year 1997 to 2001 production records were used. It is not possible to calculate a meaningful maximum due to the diversity of parts coated.

NOTE:

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Rotary Lift
Plant 2: Epoxy Paint Line
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Title V: 077-7652
Pt ID: 077-00011
Permit Reviewer: Femi Ogunsola/EVP
Date: 6/10/2003

Material	Density (Lb/Gal)	Gal of Mat per hour (gal/hour)*	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Total Combined HAPs Emissions (ton/yr)
Blue Epoxy Base	9.68	1.631250	12.26%	5.32%	10.67%	8.83	3.83	7.68	20.34
Red Epoxy Base	9.428	0.689904	12.79%	5.14%	12.97%	3.79	1.52	3.85	9.17
Yellow Epoxy Base	10.953	0.137019	10.05%	4.03%	8.09%	0.69	0.28	0.55	1.52
Black Epoxy Base	9.52	0.184135	17.90%	0.00%	10.86%	1.43	0.00	0.87	2.30
2-PKG Epoxy Converter Clear	8.17	2.750962	20.34%	0.00%	14.75%	20.02	0.00	14.52	34.54
Cleaning Solvent	6.75	0.661058	0.00%	0.00%	100.00%	0.00	0.00	19.54	19.54
Total State Potential Emissions						34.76	5.63	47.02	87.41

METHODOLOGY

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

* The parts coated on Rotary Lift's paint lines range in size from 6 inches square to over 20 feet long. These are parts of different models of a dozen types of lifts. All of these parts are required to make the finished products. Therefore, taking the gallons needed to coat the biggest part and multiplying that value by maximum number of the smallest parts that could be painted in an hour gives an answer that is physically impossible to achieve. The best way to do these calculations is on gallons of paints applied per hour. The highest annual value from year 1997 to 2001 production records were used. It is not possible to calculate a meaningful maximum due to the diversity of parts coated.

Company Name: Rotary Lift (Plant 1)
 Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
 Title V : 077-7652
 Plt ID: 077-00011
 Reviewer: Femi Ogunsola/EVP
 Date: 6/10/2003

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	0	0		0								0.000
Metal Inert Gas (MIG)(ER5154)	70	0.97		0.0052	0.000318	0.00001	0.00001	0.353	0.02159	0.001	0.000679	0.023
Stick (E7018 electrode)	0	0										0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	0										0.000
Oxyacetylene(carbon steel)	0	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)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxy Burner	1	0.75	90	0.023518519	0.0005	0.0001	0.0003	0.095	0.000	0.000	0.000	0.000
Plasma	1	0.75	90	0.023518519				0.095	0.000	0.000	0.000	0.000
Laser	1	0.6	90	0.002				0.006				
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.55	0.02	0.00	0.00	0.02
Potential Emissions lbs/day								13.20	0.52	0.00	0.02	0.55
Potential Emissions tons/year								2.41	0.09	0.00	0.00	0.10

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

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

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)

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

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

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

Data supplied by the source. Emission factors based upon the maximum possible metal removal rate (from Manufacturer's Specifications for each unit) and the Air Pollution Engineering Manual emission factor for scarfing (a very similar operation). Emission factor is derived from 0.0015lb of particulate per pound of metal removed. This is found on page 640 of the Air Pollution Engineering Manual, Copyright 1992, Van Nostrand Reinhold, New York, NY.

Company Name: Rotary Lift (Plant 2)
 Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
 Title V : 077-7652
 Plt ID: 077-00011
 Reviewer: Femi Ogunsola/EVP
 Date: 6/10/2003

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	0			0								0.000
Metal Inert Gas (MIG)(ER5154)	38	0.84		0.0052	0.000318	0.00001	0.00001	0.166	0.01015056	0.000	0.0003192	0.011
Stick (E7018 electrode)	0	0		0.0211								0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	0		0.0055								0.000
Oxyacetylene(carbon steel)	0	0		0.0055								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)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma (Runway Burner)	1	0.75	60	0.012				0.032	0.000	0.000	0.000	0.000
Plasma (Low Rise Burner)	1	1	20	0.126666667				0.152	0.000	0.000	0.000	0.000
Plasma (Rolling Bridge Burner)	1	0.75	90	0.027222222				0.110	0.000	0.000	0.000	0.000
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.46	0.01	0.00	0.00	0.01
Potential Emissions lbs/day								11.06	0.24	0.00	0.01	0.26
Potential Emissions tons/year								2.02	0.04	0.00	0.00	0.05

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

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

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)

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

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

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

Data supplied by the source. Emission factors based upon the maximum possible metal removal rate (from Manufacturer's Specifications for each unit) and the Air Pollution Engineering Manual emission factor for scarfing (a very similar operation). Emission factor is derived from 0.0015lb of particulate per pound of metal removed. This is found on page 640 of the Air Pollution Engineering Manual, Copyright 1992, Van Nostrand Reinhold, New York, NY.

Appendix A: Process Particulate Emissions

Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Title V: 077-7652
Plt ID: 077-00011
Reviewer: Femi Ogunsola/ EVP
Date: 6/10/2003

State Potential Emissions (tons/year)					
Baghouse					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Maximum Air Flow (acfm)	Control Efficiency	Total (tons/yr)
#1-1	1	0.01000	7700.0	0.00%	2.89
Total Emissions Based on Rated Capacity at 8,760 Hours/Year					2.89
Federal Potential Emissions (tons/year)					
Baghouse					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Maximum Air Flow (acfm)	Control Efficiency	Total (tons/yr)
#1-1	1	0.01000	7700.0	97.00%	2.89
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source control:					2.89

Methodology:**State Potential (uncontrolled):**

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control E)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control E)

Appendix A: Process Particulate Emissions

Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Title V: 077-7652
Plt ID: 077-00011
Reviewer: Femi Ogunsola/ EVP
Date: 6/10/2003

State Potential Emissions (tons/year)					
A. Baghouses					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Maximum Air Flow (acfm)	Control Efficiency	Total (tons/yr)
#2-1	1	0.01000	12000.0	0.00%	4.51
Total Emissions Based on Rated Capacity at 8,760 Hours/Year					4.51
Federal Potential Emissions (tons/year)					
A. Baghouses					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Maximum Air Flow (acfm)	Control Efficiency	Total (tons/yr)
#2-1	1	0.01000	12000.0	97.00%	4.51
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source control:					4.51

Methodology:

State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1 - Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1 - Efficiency)

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

**Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Title V: 077-7652
Plt ID: 077-00011
Reviewer: Femi Ogunsola/EVP
Date: 6/10/2003**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
38.4	336.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	94.0 **see below	5.5	40.0
Potential Emission in tons/yr	0.3	1.3	0.1	15.8	0.9	6.7

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

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

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-C (SUPPLEMENT D 3/98)

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
Small Industrial Boiler
HAPs Emissions

Company Name: Rotary Lift
Address City IN Zip: 2700 Lainer Drive, Madison, IN 47250
Title V: 077-7652
Plt ID: 077-00011
Reviewer: Femi Ogunsola/ EVP
Date: 06/12/2003

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	3.532E-04	2.018E-04	1.261E-02	3.027E-01	5.719E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.410E-05	1.850E-04	2.355E-04	6.391E-05	3.532E-04

Methodology is the same as page 10.

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

Appendix A: Emissions Calculations

Waste Oil Combustion

Used Oil Burner

Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Title V: 077-7652
Plt ID: 077-00011
Reviewer: Femi Ogunsola/EVP
Date: 6/10/2003

Heat Input Capacity

MMBtu/hr

0.185

Potential Throughput

kgals/year

11.65899281

A = Weight % Ash = 0.3

L = Weight % Lead = 0.5

S = Weight % Sulfur = 0.3

	Pollutant						
Emission Factor in lb/kgal	PM* 19.8 (66A)	PM10* 17.10 (57A)	SO2 32.1 (107S)	NOx 16.0	TOC 1.0	CO 2.1	Pb 25.0000 (50L)
Potential Emission in tons/yr	0.1154	0.0997	0.1871	0.0933	0.0058	0.0122	0.1457

Methodology

Emission Factor Units are lb/1000 gal

A = weight% ash in fuel, L = weight% lead in fuel, S = weight % sulfur in fuel

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MM Btu

Emission Factors from AP-42, Chapter 1.11, SCC 1-03-013-02 (Supplement B 10/96)

Emission (tons/yr) = Throughput kgals per year x Emission Factor (lb/kgal)/2,000 lb/ton

See next page for HAPs calculations

Appendix A: Emissions Calculations

Waste Oil Combustion

Used Oil Burner

HAPs Calculations

Company Name: Rotary Lift

Address City IN Zip: 2700 Lainer Drive, Madison, IN 47250

Title V: 077-7652

Plt ID: 077-00011

Reviewer: Femi Ogunsola/EVP

Date: 6/6/2003

	Pollutant					
Emission Factor in lb/kgal	Arsenic 6.0E-02	Cadmium 1.2E-02	Chromium 1.8E-01	Manganese 5.0E-02	Nickel 1.6E-01	Cobalt 5.2E-03
Potential Emission in tons/yr	3.50E-04	7.00E-05	1.05E-03	2.91E-04	9.33E-04	3.03E-05

Methodology is the same as previous page.