NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for McCoy Investments dba\ IDS Blast Finishing in Marion County

Significant Permit Revision No.: 097-41235-00524

The Indiana Department of Environmental Management (IDEM) has received an application from McCoy Investments dba\ IDS Blast Finishing, located at 2717 Tobey Drive, Indianapolis, Indiana 46219, for a significant revision of its FESOP issued on April 30, 2018. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow McCoy Investments dba\ IDS Blast Finishing to make certain changes at its existing source. McCoy Investments dba\ IDS Blast Finishing has applied to add one wheelabrator shot blasting unit.

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

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

Franklin Road Branch Library
5550 South Franklin Road
Indianapolis, Indiana 46239

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

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 097-41235-00524 in all correspondence.

Comments should be sent to:

L. David Cohen  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCM 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for L. David Cohen or (317) 233-0178  
Or dial directly: (317) 233-9327  
Fax: (317) 232-6749 attn: L. David Cohen  
E-mail: LCOhen@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

If you have any questions, please contact L. David Cohen of my staff at the above address.

Madhurima D. Moulid, Ph.D., Section Chief  
Permits Branch  
Office of Air Quality
Mr. Michael Archer  
McCoy Investments dba\ IDS Blast Finishing  
2717 Tobey Drive  
Indianapolis, Indiana 46219  

Re: 097-41235-00524  
Significant Revision to  
F097-39520-00524  

Dear Mr. Archer:  

McCoy Investments dba\ IDS Blast Finishing was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F F097-39520-00524, on April 30, 2018, for a stationary surface finishing operation (metal fabrication, finishing, and coating of I-beams, weldments, and other miscellaneous parts and products) located at 2717 Tobey Drive, Indianapolis, Indiana 46219. On March 22, 2019, the Office of Air Quality (OAQ) received an application from the source requesting the addition of a new wheelabrator blasting unit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).  

Pursuant to 326 IAC 2-8-11.1, the following emission unit is approved for construction at the source:  

(l) One (1) wheelabrator, identified as SB17, approved in 2019 for construction, with a maximum capacity of 26,474 lb/hr of steel shot, using baghouse CE22 as control, and exhausting indoors.  

The following construction conditions are applicable to the proposed project:  

**General Construction Conditions**  

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).  

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.  

**Effective Date of the Permit**  

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.  

**Commenced Construction**  

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.  

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. The permit references the below-listed attachment(s). Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this revision:

Attachment A: 40 CFR 60, Subpart EE, Standards of Performance for Surface Coating of Metal Furniture

Previously issued approvals for this source containing this attachment is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Previously issued approvals for this source are also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.


A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact L. David Cohen, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-0178 or (800) 451-6027, and ask for L. David Cohen or (317) 233-9327.

Sincerely,

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Marion County
Marion County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY
DRAFT
McCoy Investments dba\ IDS Blast Finishing
2717 Tobey Drive
Indianapolis, Indiana 46219

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

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.
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Attachment A: New Source Performance Standard for Surface Coating of Metal Furniture
[40 CFR 60, Subpart EE] [326 IAC 12]
SECTION A  SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary surface finishing operation (metal fabrication, finishing, and coating).

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>2717 Tobey Drive, Indianapolis, Indiana 46219</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(317) 545-0665</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>7699 and 7532</td>
</tr>
<tr>
<td>County Location:</td>
<td>Marion Outside Center, Perry, and Wayne Townships</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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

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

(a) One (1) Blast Room, identified as SB1, constructed in 2003, with a maximum capacity of 1818 lbs/hr of StarBlast media, using baghouse CE5 as control, and exhausting indoors.

(b) One (1) Empire shot blast unit, identified as SB2, constructed in 2005, with a maximum capacity of 2480 lbs/hr of glass bead media, using baghouse CE6 as control, and exhausting indoors.

(c) One (1) Gibson shot blast unit, identified as SB3, constructed in 2003, with a maximum capacity of 7920 lbs/hr of steel shot, using baghouse CE7 as control, and exhausting indoors.

(d) One (1) Goff shot blast unit, identified as SB4, constructed in 2003, with a maximum capacity of 3234 lbs/hr of steel shot, using baghouse CE8 as control, and exhausting indoors.

(e) Two (2) LS shot blast units, identified as SB5 and SB6, constructed in 2003, with a maximum capacity of 1294 lbs/hr of steel shot each, using baghouse CE10 and CE11, respectively, as control, and exhausting indoors.

(f) Four (4) Pauli shot blast units, identified as SB7, SB8, SB12, SB13, constructed in 2003, with a maximum capacity of 424 lbs/hr of glass bead media each, using baghouse CE12, CE13, CE16, and CE17, respectively, as control, and exhausting indoors.

(g) One (1) Empire barrel blaster, identified as SB10, constructed in 2003, with a maximum capacity of 1030 lbs/hr of steel shot, using baghouse CE14 as control, and exhausting indoors.

(h) One (1) shot blast unit, identified as SB11, constructed in 2003, with a maximum capacity of 530 lbs/hr of aluminum oxide, using baghouse CE18 as control, and exhausting indoors.
(i) One (1) Guyson shot blast unit, identified as SB14, constructed in 2003, with a maximum capacity of 530 lbs/hr of aluminum oxide, using baghouse CE15 as control, and exhausting indoors.

(j) One (1) Pauli shot blast unit, identified as SB15, constructed in 2005, with a maximum capacity of 259 lbs/hr of soda blast media, using baghouse CE20 as control, and exhausting indoors.

(k) One (1) wheelabrator, identified as SB16, constructed in 2003, with a maximum capacity of 31,769 lbs/hr of steel grit, using baghouse CE21 as control, and exhausting indoors.

(l) One (1) wheelabrator, identified as SB17, approved in 2019 for construction, with a maximum capacity of 26,474 lb/hr of steel shot, using baghouse CE22 as control, and exhausting indoors.

(m) One (1) paint booth, identified as SC2, constructed in 2014, with a maximum capacity of 0.333 units per hour, using dry filters as control, identified as CE2, for control, and exhausting to stack S11 and S18.

(n) One (1) powder coating booth, identified as SC3, constructed in 2014, with a maximum capacity of 200 pounds per hour of powder coating, using dry filters as control, identified as CE3, and exhausting indoors.

(o) One (1) dip tank, identified as SC4, constructed in 2005, with a maximum capacity of 0.11 gallons of coating per hour.

(p) One (1) roll coating operation, identified as SC5, constructed in 2002, with a maximum capacity of 1.15 gallons of coating per hour.

Under 40 CFR Part 60, Subpart EE, emission units SC2, SC4, and SC5 are considered affected facilities.

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

This stationary source also includes the following specifically regulated insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include:

(1) One (1) furnace, identified as EC1, constructed in 1992, with a maximum heat input capacity of 0.28 MMBtu/hour, and exhausting to stack S1.

(2) Two (2) furnaces, identified as EC2 and EC3, constructed in 2009, with a maximum heat input capacity of 0.12 MMBtu/hour each, and exhausting to stack S2.

(3) One (1) pressure washer, identified as EC4, constructed in 2014, with a maximum heat input capacity of 0.33 MMBtu/hour, exhausting to stack S3.

(4) One (1) furnace, identified as EC5, constructed in 2006, with a maximum heat input capacity of 0.12 MMBtu/hour, exhausting to stack S6.

(5) One (1) furnace, identified as EC6, constructed in 1992, with a maximum heat input capacity of 0.15 MMBtu/hour, exhausting to stack S7.

(6) One (1) furnace, identified as EC7, constructed in 1992, with a maximum heat input capacity of 0.32 MMBtu/hour, exhausting to stack S8.
(7) One (1) make-up air unit, identified as EC9, constructed in 2014, with a maximum heat input capacity of 3.42 MMBtu/hour, exhausting to stack S18.

(8) One (1) curing oven, identified as EC10, constructed in 2014, with a maximum heat input capacity of 2.0 MMBtu/hour, exhausting of stack S14.

(9) One (1) small burn off oven, identified as EC11, constructed in 2004, with a maximum heat input capacity of 0.85 MMBtu/hour, exhausting to stack S15.

(10) One (1) large burn off oven, identified as EC12, constructed in 2005, with a maximum heat input capacity of 2.88 MMBtu/hour, exhausting to stack S16.

(11) One (1) furnace, identified as EC13, constructed in 2006, with a maximum heat input capacity of 0.32 MMBtu/hour, exhausting to stack S17.

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

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

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

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

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

(a) This permit, F097-39520-00524, is issued for a fixed term of ten (10) years from the
issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and
IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not
affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to
issue or deny the permit renewal prior to the expiration date of this permit, this existing
permit shall not expire and all terms and conditions shall continue in effect, until the
renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air
Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

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

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

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

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

(1) it contains a certification by an "authorized individual", as defined by
326 IAC 2-1.1-1(1), and
(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D.1, D.2, D.3, or E.1 of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

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

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

1. If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

2. If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

   A. The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

   B. Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

(a) All terms and conditions of permits established prior to F097-39520-00524 and issued pursuant to permitting programs approved into the state implementation plan have been either:

1. incorporated as originally stated,

2. revised, or

3. deleted.

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating
Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the
deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

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

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

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

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

**Entire Source**

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

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

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

(a) Pursuant to 326 IAC 2-8:

   (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

   (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

   (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source’s potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.2 Opacity [326 IAC 5-1]**

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;
(B) Removal or demolition contractor; or
(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control
requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

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

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

C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.12 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

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

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

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

(1) monitoring results;

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

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

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

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

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

C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

(AA) All calibration and maintenance records.

(BB) All original strip chart recordings for continuous monitoring instrumentation.

(CC) Copies of all reports required by the FESOP.

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

(AA) The date, place, as defined in this permit, and time of sampling or measurements.

(BB) The dates analyses were performed.

(CC) The company or entity that performed the analyses.

(DD) The analytical techniques or methods used.

(EE) The results of such analyses.

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

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

C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

Stratospheric Ozone Protection

C.16 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

(a) One (1) Blast Room, identified as SB1, constructed in 2003, with a maximum capacity of 1818 lbs/hr of StarBlast media, using baghouse CE5 as control, and exhausting indoors.

(b) One (1) Empire shot blast unit, identified as SB2, constructed in 2005, with a maximum capacity of 2480 lbs/hr of glass bead media, using baghouse CE6 as control, and exhausting indoors.

(c) One (1) Gibson shot blast unit, identified as SB3, constructed in 2003, with a maximum capacity of 7920 lbs/hr of steel shot, using baghouse CE7 as control, and exhausting indoors.

(d) One (1) Goff shot blast unit, identified as SB4, constructed in 2003, with a maximum capacity of 3234 lbs/hr of steel shot, using baghouse CE8 as control, and exhausting indoors.

(e) Two (2) LS shot blast units, identified as SB5 and SB6, constructed in 2003, with a maximum capacity of 1294 lbs/hr of steel shot each, using baghouse CE10 and CE11, respectively, as control, and exhausting indoors.

(f) Four (4) Pauli shot blast units, identified as SB7, SB8, SB12, SB13, constructed in 2003, with a maximum capacity of 424 lbs/hr of glass bead media each, using baghouse CE12, CE13, CE16, and CE17, respectively, as control, and exhausting indoors.

(g) One (1) Empire barrel blaster, identified as SB10, constructed in 2003, with a maximum capacity of 1030 lbs/hr of steel shot, using baghouse CE14 as control, and exhausting indoors.

(h) One (1) shot blast unit, identified as SB11, constructed in 2003, with a maximum capacity of 530 lbs/hr of aluminum oxide, using baghouse CE18 as control, and exhausting indoors.

(i) One (1) Guyson shot blast unit, identified as SB14, constructed in 2003, with a maximum capacity of 530 lbs/hr of aluminum oxide, using baghouse CE15 as control, and exhausting indoors.

(j) One (1) Pauli shot blast unit, identified as SB15, constructed in 2005, with a maximum capacity of 259 lbs/hr of soda blast media, using baghouse CE20 as control, and exhausting indoors.

(k) One (1) wheelabrator, identified as SB16, constructed in 2003, with a maximum capacity of 31,769 lbs/hr of steel grit, using baghouse CE21 as control, and exhausting indoors.

(l) One (1) wheelabrator, identified as SB17, approved in 2019 for construction, with a maximum capacity of 26,474 lb/hr of steel shot, using baghouse CE22 as control, and exhausting indoors.

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

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

- **Particulate Matter (PM) Limitations [326 IAC 6.5-1-2]**
  
Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from each of the shot blast units shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

- **FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2]**
  
Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:
(a) The one (1) wheelabrator, identified as SB17, shall be limited to less than 4,000 operational hours per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) PM, PM10, and PM2.5 emissions (after control) from the shot blast units shall not exceed the limits contained in the table below:

<table>
<thead>
<tr>
<th>Shot Blast Units</th>
<th>PM Emission Limit (lbs/hr)</th>
<th>PM10 and PM2.5 Emission Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB1</td>
<td>0.73</td>
<td>0.73</td>
</tr>
<tr>
<td>SB2</td>
<td>0.93</td>
<td>0.93</td>
</tr>
<tr>
<td>SB3</td>
<td>1.27</td>
<td>1.09</td>
</tr>
<tr>
<td>SB4</td>
<td>0.52</td>
<td>0.44</td>
</tr>
<tr>
<td>SB5</td>
<td>0.21</td>
<td>0.18</td>
</tr>
<tr>
<td>SB6</td>
<td>0.21</td>
<td>0.18</td>
</tr>
<tr>
<td>SB7</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>SB8</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>SB10</td>
<td>0.41</td>
<td>0.41</td>
</tr>
<tr>
<td>SB11</td>
<td>0.21</td>
<td>0.21</td>
</tr>
<tr>
<td>SB12</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>SB13</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>SB14</td>
<td>0.21</td>
<td>0.21</td>
</tr>
<tr>
<td>SB15</td>
<td>0.10</td>
<td>0.10</td>
</tr>
<tr>
<td>SB16</td>
<td>10.17</td>
<td>8.74</td>
</tr>
<tr>
<td>SB17</td>
<td>8.47</td>
<td>7.29</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period, PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.1.4 Particulate Control

(a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses for particulate control shall be in operation and control emissions from the shot blast units at all times the shot blast units are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1)] [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Conditions D.1.1 and D.1.2, not later than five (5) years from the most recent compliance stack test for one (1) of the emission units (after control) listed in the following table, the Permittee shall perform PM, PM10, and PM2.5 testing for one (1) of the emission units (after control) listed in the following table, at least once every five (5) years from the date of the most recent valid compliance demonstration, utilizing methods as approved by the Commissioner. The source will test the emission unit for which the longest period of time has passed since the last valid compliance test for the emission units listed in the following table. In addition to these requirements, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 include filterable and condensable particulate matter.

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Emission Unit Description</th>
<th>Control Device</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB1</td>
<td>Blast Room</td>
<td>Baghouse CE5</td>
</tr>
<tr>
<td>SB2</td>
<td>Empire Shot Blast Unit</td>
<td>Baghouse CE6</td>
</tr>
<tr>
<td>SB3</td>
<td>Gibson Shot Blast Unit</td>
<td>Baghouse CE7</td>
</tr>
</tbody>
</table>

(b) In order to demonstrate compliance status with conditions D.1.1 and D.1.2, not later than five (5) years from the most recent compliance stack test, the Permittee shall perform PM, PM10, and PM2.5 testing on the one (1) wheelabrator, identified as SB16, (after control) at least once every five (5) years from the date of the most recent valid compliance demonstration, utilizing methods as approved by the Commissioner.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 include filterable and condensable particulate matter.

(c) In order to demonstrate compliance status with Conditions D.1.1 and D.1.2, not later than one hundred eighty (180) days after the initial startup of the one (1) wheelabrator, identified as SB17, the Permittee shall conduct PM, PM10 and PM2.5 testing on the one (1) wheelabrator, identified as SB17, controlled by baghouse CE22, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable particulate matter.
Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.1.6 Baghouse Inspections

An inspection shall be performed semi-annually of all bags controlling the shot blast units. All defective bags shall be replaced.

D.1.7 Broken or Failed Bag Detection

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

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

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

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

D.1.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.2(a), the Permittee shall maintain records of the hours of operation of shotblaster SB17.

(b) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6.

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

D.1.9 Reporting Requirements

Quarterly summaries of the information to document compliance status with Condition D.1.2(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(l) One (1) paint booth, identified as SC2, constructed in 2014, with a maximum capacity of 0.333 units per hour, using dry filters as control, identified as CE2, for control, and exhausting to stack S11 and S18.

(m) One (1) powder coating booth, identified as SC3, constructed in 2014, with a maximum capacity of 200 pounds per hour of powder coating, using dry filters as control, identified as CE3, and exhausting indoors.

(n) One (1) dip tank, identified as SC4, constructed in 2005, with a maximum capacity of 0.11 gallons of coating per hour.

(o) One (1) roll coating operation, identified as SC5, constructed in 2002, with a maximum capacity of 1.15 gallons of coating per hour.

Under 40 CFR Part 60, Subpart EE, emission units SC2, SC4, and SC5 are considered affected facilities.

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

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

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

(a) Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the powder coating booth (SC3) shall not exceed three hundredths (0.03) grain per dry standard cubic foot (dscf)).

(b) Pursuant to 326 IAC 6.5-1-2(h), paint booth (SC2) shall be controlled by a dry particulate filter, water wash, or an equivalent control device and the source shall operate the control device in accordance with manufacturer's specifications.

D.2.2 FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM, PM10, and PM2.5 emissions (after control) from the powder coating booth (SC3) shall not exceed 2.00 pounds per hour, each.

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period, PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.3 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), when coating miscellaneous metal parts and products in the paint booth (SC2) and the roll coating operation (SC5), the Permittee shall not allow the discharge into the atmosphere VOC in excess of the following:

(a) Four and three-tenths (4.3) pounds per gallon of coating, excluding water, as delivered to the applicator in each paint booth where clear coatings are applied. A clear coating is a coating that:
(1) lacks color or opacity; and
(2) is transparent and uses the undercoat as a reflective base or undertone color.

(b) Three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator in each paint booth where units are air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

(c) Three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator in each paint booth where extreme performance coatings are applied. Extreme performance coatings are designed for exposure to:

(1) Temperatures consistently above 95 degrees Celsius;
(2) detergents;
(3) abrasive or scouring agents;
(4) solvents;
(5) corrosive atmosphere;
(6) outdoor weather at all times; or
(7) similar environmental conditions

(d) Three (3) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator in each paint booth for all other coatings and coating application systems.


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

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

(b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.2.6 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the dry filters for particulate control shall be in operation and control emissions from the paint booth (SC2) and the powder coating booth (SC3) at all times the paint booth (SC2) and the powder coating booth (SC3) are in operation.

D.2.7 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limitation contained in Condition D.2.3 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 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.2.8 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 powder coating booth (SC3) while the booth is in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed for the presence of overspray on the rooftops and the nearby ground. When evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.1(b)(3), the Permittee shall maintain a record of any actions taken if overspray is visibly detected.

(b) To document the compliance status with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.2.3.

(1) The VOC content of each coating material used less water.

(2) The amount of each coating material and solvent used on daily 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 solvent.

(c)
To document the compliance status with Condition D.2.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Specifically Regulated Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include:

1. One (1) furnace, identified as EC1, constructed in 1992, with a maximum heat input capacity of 0.28 MMBtu/hour, and exhausting to stack S1.

2. Two (2) furnaces, identified as EC2 and EC3, constructed in 2009, with a maximum heat input capacity of 0.12 MMBtu/hour each, and exhausting to stack S2.

3. One (1) pressure washer, identified as EC4, constructed in 2014, with a maximum heat input capacity of 0.33 MMBtu/hour, exhausting to stack S3.

4. One (1) furnace, identified as EC5, constructed in 2006, with a maximum heat input capacity of 0.12 MMBtu/hour, exhausting to stack S6.

5. One (1) furnace, identified as EC6, constructed in 1992, with a maximum heat input capacity of 0.15 MMBtu/hour, exhausting to stack S7.

6. One (1) furnace, identified as EC7, constructed in 1992, with a maximum heat input capacity of 0.32 MMBtu/hour, exhausting to stack S8.

7. One (1) make-up air unit, identified as EC9, constructed in 2014, with a maximum heat input capacity of 3.42 MMBtu/hour, exhausting to stack S18.

8. One (1) curing oven, identified as EC10, constructed in 2014, with a maximum heat input capacity of 2.0 MMBtu/hour, exhausting of stack S14.

9. One (1) small burn off oven, identified as EC11, constructed in 2004, with a maximum heat input capacity of 0.85 MMBtu/hour, exhausting to stack S15.

10. One (1) large burn off oven, identified as EC12, constructed in 2005, with a maximum heat input capacity of 2.88 MMBtu/hour, exhausting to stack S16.

11. One (1) furnace, identified as EC13, constructed in 2006, with a maximum heat input capacity of 0.32 MMBtu/hour, exhausting to stack S17.

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

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

D.3.1 Particulate Matter (PM) Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from each of the natural gas combustion units shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

D.3.2 Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), the Permittee shall comply with the following for the small burn off oven (EC11) and large burn off oven (EC12):

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

1. Consist of primary and secondary chambers or the equivalent.
(2) Be equipped with a primary burner unless burning only wood products.

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

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

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

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

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

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

(b) An owner or operator developing an operation and maintenance plan pursuant to subsection (a)(4) must comply with the following:

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

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

(B) Procedures for incinerator startup and shutdown.

(C) Procedures for responding to a malfunction.

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

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

(F) Procedures for handling ash.

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

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

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

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

(c) The owner or operator of the incinerator must make the manufacturer’s specifications or the operation and maintenance plan available to the department upon request.
D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
### Emissions Unit Description:

<table>
<thead>
<tr>
<th>Description</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>(l) One (1) paint booth, identified as SC2, constructed in 2014, with a maximum capacity of 0.333 units per hour, using dry filters as control, identified as CE2, for control, and exhausting to stack S11 and S18.</td>
<td></td>
</tr>
<tr>
<td>(n) One (1) dip tank, identified as SC4, constructed in 2005, with a maximum capacity of 0.11 gallons of coating per hour.</td>
<td></td>
</tr>
<tr>
<td>(o) One (1) roll coating operation, identified as SC5, constructed in 2002, with a maximum capacity of 1.15 gallons of coating per hour.</td>
<td></td>
</tr>
</tbody>
</table>

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

### New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]

#### E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

| (a) | Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart EE. |
| (b) | Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:  
   
   Indiana Department of Environmental Management  
   Compliance and Enforcement Branch, Office of Air Quality  
   100 North Senate Avenue  
   MC 61-53 IGCN 1003  
   Indianapolis, Indiana 46204-2251 |

#### E.1.2 New Source Performance Standard for Surface Coating of Metal Furniture NSPS [326 IAC 12] [40 CFR Part 60, Subpart EE]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart EE (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

1. 40 CFR 60.310(c)  
2. 40 CFR 60.311

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

#### E.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: McCoy Investments dba\ IDS Blast Finishing
Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219
FESOP Permit No.: F097-39520-00524

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)___________________________________________________
☐ Report (specify)_______________________________________________________
☐ Notification (specify)____________________________________________________
☐ Affidavit (specify)_______________________________________________________
☐ Other (specify)_________________________________________________________

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

Signature:

Printed Name:

Title/Position:

Date:
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: McCoy Investments dba IDS Blast Finishing
Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219
FESOP Permit No.: F097-39520-00524

This form consists of 2 pages

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  • The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  • The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
### If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
<td></td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
<td>Y</td>
</tr>
<tr>
<td>Describe:</td>
<td></td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO$_2$, VOC, NO$_x$, CO, Pb, other:</td>
<td></td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
<td></td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
<td></td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
<td></td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
<td></td>
</tr>
</tbody>
</table>

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: ____________________________
Source Name: McCoy Investments dba\ IDS Blast Finishing  
Current Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219  
FESOP Permit No.: F097-41235-00524  
Facility: Wheelabrator SB17  
Parameter: Hours of Operation  
Limit: The one (1) wheelabrator, identified as SB17, shall be limited to less than 4,000 operational hours per twelve (12) consecutive month period.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
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<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Hours of operation This Month</td>
<td>Hours of operation Previous 11 Months</td>
<td>Hours of operation 12 Month Total</td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.  
☐ Deviation/s occurred in this quarter.  
Deviations has been reported on: ___________________

Submitted by: _____________________________________________________
Title / Position: ____________________________________________________
Signature: ________________________________________________________
Date: ____________________________________________________________
Phone: __________________________________________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

- **NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**
- **THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
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| Number of Deviations: |

| Probable Cause of Deviation: |

| Response Steps Taken: |

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| Number of Deviations: |

| Probable Cause of Deviation: |

<p>| Response Steps Taken: |</p>
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<td>Response Steps Taken:</td>
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<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________

Title / Position: ________________________________

Date: ________________________________

Phone: ________________________________
Source Description and Location

Source Name: McCoy Investments dba IDS Blast Finishing
Source Location: 2717 Tobey Drive, Indianapolis, IN 46219
County: Marion (Warren Township)
SIC Code: 7699 (Repair Shops and Related Services, Not Elsewhere Classified) and 7532 (Top, Body, and Upholstery Repair Shops and Paint Shops)
Operation Permit No.: F097-39520-00524
Operation Permit Issuance Date: April 30, 2018
Significant Permit Revision No.: 097-41235-00524
Permit Reviewer: L. David Cohen

Existing Approvals

The source was issued FESOP Renewal No. F 097-39520-00524 on April 30, 2018. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Marion County, Warren Township.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Non-attainment effective October 4, 2013, for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the county.</td>
</tr>
<tr>
<td>CO</td>
<td>Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Attainment effective July 11, 2013, for the annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011.</td>
</tr>
</tbody>
</table>

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as
attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

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

### Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

### Greenhouse Gas (GHG) Emissions

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

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

### Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (ton/year)</th>
<th>PM(^1)</th>
<th>PM(10)(^1)</th>
<th>PM(_{2.5})(^{1,2})</th>
<th>SO(_2)</th>
<th>NO(_x)</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP(^3)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>77.6</td>
<td>70.3</td>
<td>70.3</td>
<td>0.03</td>
<td>4.68</td>
<td>28.46</td>
<td>3.94</td>
<td>5.83 (Xylene)</td>
<td>8.50</td>
</tr>
</tbody>
</table>
Source-Wide Emissions Prior to Revision (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM(^1)</th>
<th>PM(_{10})(^1)</th>
<th>PM(_{2.5})(^{1,2})</th>
<th>SO(_2)</th>
<th>NO(_X)</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP(^3)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title V Major Source</td>
<td></td>
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</tr>
<tr>
<td>Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
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<tr>
<td>PSD Major Source</td>
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<td>250</td>
<td>250</td>
<td>250</td>
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</tr>
</tbody>
</table>

1. Under the Part 70 Permit program (40 CFR 70), PM\(_{10}\) and PM\(_{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."

2. PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

3. Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of FESOP Renewal No. F 097-39520-00524, issued on April 30, 2018.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by McCoy Investments dba IDS Blast Finishing on March 22, 2019, relating to the addition of a new wheelabrator blasting unit.

The following is a list of the new emission unit and pollution control device(s):

(l) One (1) wheelabrator, identified as SB17, approved in 2019 for construction, with a maximum capacity of 26,474 lb/hr of steel shot, using baghouse CE22 as control, and exhausting indoors.

“Integral Part of the Process” Determination

The source submitted the following information to justify why the one (1) existing baghouse, identified as CE21, and the one (1) proposed baghouse, identified as CE22, should be considered an integral part of the shot blasting process:

CE21

(a) The baghouse serves a primary purpose other than pollution control.

The Permittee has claimed that fine media and dirt are removed through the baghouse. This prevents depositing dirt back into the parts being cleaned. Undersized media must be removed to prevent accelerated equipment wear and insufficient and/or inconsistent cleaning. Additionally, the fine steel particles are more likely to bond in the presence of humidity, causing equipment damage and production losses. If the filters do not operate properly, the operator is instructed to shut down the machine.

This control device is designed to recycle used steel shot, which is then transported by elevator back to the hopper.

(b) The process cannot operate without the baghouse.
The Permittee has not provided evidence that the shotblaster cannot operate without the associated baghouse.

(c) The baghouse has an overwhelming positive net economic effect.

The Permittee has submitted information related to net economic benefit of operating the baghouse. IDEM, OAQ has not been able to verify or validate the net cost benefit of operating the baghouse.

CE22

(a) The baghouse serves a primary purpose other than pollution control.

The Permittee has claimed that fine media and dirt are removed through the baghouse. This prevents depositing dirt back into the parts being cleaned. Undersized media must be removed to prevent accelerated equipment wear and insufficient and/or inconsistent cleaning. Additionally, the fine steel particles are more likely to bond in the presence of humidity, causing equipment damage and production losses. If the filters do not operate properly, the operator is instructed to shut down the machine.

This control device is designed to recycle used steel shot, which is then transported by elevator back to the hopper.

(b) The process cannot operate without the baghouse.

The Permittee has not provided evidence that the shotblaster cannot operate without the associated baghouse.

(c) The baghouse has an overwhelming positive net economic effect.

The Permittee has submitted information related to net economic benefit of operating the baghouse. IDEM, OAQ has not been able to verify or validate the net cost benefit of operating the baghouse.

IDEM, OAQ evaluated the information submitted and has determined that the two (2) baghouses for the proposed and existing baghouses should not be considered an integral part of the shot blasting process because the Permittee has not been able to provide valid information related to the net economic effect and the inability to operate the shotblaster without operating the baghouse. Therefore, the potential to emit PM, PM10, and PM2.5 from the two (2) wheelabrator units, identified as SB16 and SB17, were calculated before the baghouses, identified as CE21 and CE22, respectively, for purposes of determining permitting level and applicability of 326 IAC 2-2 (PSD) and 326 IAC 2-8-4 (FESOP).

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – FESOP Significant Permit Revision

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

### PTE Before Controls of the New Emission Units (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$$^1$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^2$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wheelabrator SB17</td>
<td>463.8</td>
<td>398.9</td>
<td>398.9</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units:</strong></td>
<td>463.8</td>
<td>398.9</td>
<td>398.9</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^2$Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit greater than or equal to twenty-five (25) tons per year of the following pollutants:

(i) PM, PM$_{10}$, or direct PM$_{2.5}$.

### PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$^1$</td>
</tr>
<tr>
<td>-------</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitives</strong></td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

$^1$Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a “regulated air pollutant.”

$^2$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^3$Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.
The source opted to take PM, PM$_{10}$, or direct PM$_{2.5}$ limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) 326 IAC 2-8 (FESOP), for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit criteria pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability Determination**

Due to the proposed revision, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed revision.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed revision.

**Compliance Assurance Monitoring (CAM):**

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

**State Rule Applicability - Entire Source**

Due to this revision, state rule applicability has been reviewed as follows:

**326 IAC 2-2 (PSD)**

PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

**PSD Minor Source & 326 IAC 2-8-4 (FESOP) Limits**

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The one (1) wheelabrator, identified as SB17, shall be limited to less than 4,000 operational hours per twelve (12) consecutive month period.

(b) PM, PM$_{10}$, and PM$_{2.5}$ emissions (after control) from the shot blast units shall not exceed the limits contained in the table below:
<table>
<thead>
<tr>
<th>Shot Blast Units</th>
<th>PM Emission Limit (lbs/hr)</th>
<th>PM10 and PM2.5 Emission Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB1</td>
<td>0.73</td>
<td>0.73</td>
</tr>
<tr>
<td>SB2</td>
<td>0.93</td>
<td>0.93</td>
</tr>
<tr>
<td>SB3</td>
<td>1.27</td>
<td>1.09</td>
</tr>
<tr>
<td>SB4</td>
<td>0.52</td>
<td>0.44</td>
</tr>
<tr>
<td>SB5</td>
<td>0.21</td>
<td>0.18</td>
</tr>
<tr>
<td>SB6</td>
<td>0.21</td>
<td>0.18</td>
</tr>
<tr>
<td>SB7</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>SB8</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>SB10</td>
<td>0.41</td>
<td>0.41</td>
</tr>
<tr>
<td>SB11</td>
<td>0.21</td>
<td>0.21</td>
</tr>
<tr>
<td>SB12</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>SB13</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>SB14</td>
<td>0.21</td>
<td>0.21</td>
</tr>
<tr>
<td>SB15</td>
<td>0.10</td>
<td>0.10</td>
</tr>
<tr>
<td>SB16</td>
<td>10.17</td>
<td>8.74</td>
</tr>
<tr>
<td>SB17 (proposed)</td>
<td>8.47</td>
<td>7.29</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The new emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, LaPorte, or Lawrenceburg Township, Dearborn County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

1. Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4:

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source (located in Marion County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.5-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Marion County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

<table>
<thead>
<tr>
<th>State Rule Applicability – Individual Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Due to the proposed revision, state rule applicability has been reviewed as follows:</td>
</tr>
<tr>
<td>Shot Blasting (SB1 - SB8, SB10 - SB17)</td>
</tr>
</tbody>
</table>

326 IAC 6.5 (PM Limitations Except Lake County)
The requirements of 326 IAC 6.5 apply to facilities located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne, which have the potential to emit one hundred (100) tons or more, or actual emissions of ten (10) tons or more of particulate matter per year. The shot blast units SB1 - SB8 and SB10 - SB17 have potential particulate matter emissions greater than one hundred (100) tons per year and actual emissions have the potential to exceed ten (10) tons or more per year. Therefore, the source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from the proposed shot blast unit SB17 shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), the proposed shot blasting process SB17 is not subject to the requirements of 326 IAC 6-3, since the unit is subject to a particulate matter emission limit under 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) that is more stringent than the particulate limitation required by 326 IAC 6-3.

<table>
<thead>
<tr>
<th>Compliance Determination and Monitoring Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) The Compliance Determination Requirements applicable to this revision are as follows:</td>
</tr>
</tbody>
</table>

Testing Requirements:

<table>
<thead>
<tr>
<th>Summary of Testing Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit</td>
</tr>
<tr>
<td>Wheelabrator (SB17)</td>
</tr>
</tbody>
</table>

Notes:
1. 180 days after startup of the new wheelabrator SB17.
(b) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

<table>
<thead>
<tr>
<th>Control Device &amp; Emission Unit</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wheelabrator SB17 (Baghouse CE22)</td>
<td>Baghouse Inspections</td>
<td>Semi-annually</td>
<td>normal/defective</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the baghouses for the shot blast units must operate properly to assure compliance with 326 IAC 6.5 (Particulate Emissions Limitations Except Lake County), 326 2-8-4 (FESOP) and the limits that render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

---

**Proposed Changes**

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text:

(1) Section A.2 has been revised to include the proposed wheelabrator.

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

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

(a) One (1) Blast Room, identified as SB1, constructed in 2003, with a maximum capacity of 1818 lbs/hr of StarBlast media, using baghouse CE5 as control, and exhausting indoors.

(b) One (1) Empire shot blast unit, identified as SB2, constructed in 2005, with a maximum capacity of 2480 lbs/hr of glass bead media, using baghouse CE6 as control, and exhausting to the indoors.

(c) One (1) Gibson shot blast unit, identified as SB3, constructed in 2003, with a maximum capacity of 7920 lbs/hr of steel shot, using baghouse CE7 as control, and exhausting to the indoors.

(d) One (1) Goff shot blast unit, identified as SB4, constructed in 2003, with a maximum capacity of 3234 lbs/hr of steel shot, using baghouse CE8 as control, and exhausting to the indoors.

(e) Two (2) LS shot blast units, identified as SB5 and SB6, constructed in 2003, with a maximum capacity of 1294 lbs/hr of steel shot each, using baghouse CE10 and CE11, respectively, as control, and exhausting to the indoors.

(f) Four (4) Pauli shot blast units, identified as SB7, SB8, SB12, SB13, constructed in 2003, with a maximum capacity of 424 lbs/hr of glass bead media each, using baghouse CE12, CE13, CE16, and CE17, respectively, as control, and exhausting to the indoors.

(g) One (1) Empire barrel blaster, identified as SB10, constructed in 2003, with a maximum capacity of 1030 lbs/hr of steel shot, using baghouse CE14 as control, and exhausting to the indoors.

(h) One (1) shot blast unit, identified as SB11, constructed in 2003, with a maximum capacity of 530 lbs/hr of aluminum oxide, using baghouse CE18 as control, and exhausting to the indoors.

(i) One (1) Guyson shot blast unit, identified as SB14, constructed in 2003, with a maximum capacity of 530 lbs/hr of aluminum oxide, using baghouse CE15 as control, and exhausting to the indoors.

(j) One (1) Pauli shot blast unit, identified as SB15, constructed in 2005, with a maximum capacity of 259 lbs/hr of soda blast media, using baghouse CE20 as control, and exhausting to the indoors.

(k) One (1) wheelabrator, identified as SB16, constructed in 2003, with a maximum capacity of 31,769 lbs/hr of steel grit, using baghouse CE21 as control, and exhausting to the indoors.
(l) One (1) wheelabrator, identified as SB17, approved in 2019 for construction, with a maximum capacity of 26,474 lb/hr of steel shot, using baghouse CE22 as control, and exhausting indoors.

(im) One (1) paint booth, identified as SC2, constructed in 2014, with a maximum capacity of 0.333 units per hour, using dry filters as control, identified as CE2, for control, and exhausting to stack S11 and S18.

(ın) One (1) powder coating booth, identified as SC3, constructed in 2014, with a maximum capacity of 200 pounds per hour of powder coating, using dry filters as control, identified as CE3, and exhausting to the indoors.

(no) One (1) dip tank, identified as SC4, constructed in 2005, with a maximum capacity of 0.11 gallons of coating per hour.

(op) One (1) roll coating operation, identified as SC5, constructed in 2002, with a maximum capacity of 1.15 gallons of coating per hour.

Under 40 CFR Part 60, Subpart EE, emission units SC2, SC4, and SC5 are considered affected facilities.

Section D.1 has been revised to incorporate the requirements for the proposed shot blast unit SB17.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) One (1) Blast Room, identified as SB1, constructed in 2003, with a maximum capacity of 1818 lbs/hr of StarBlast media, using baghouse CE5 as control, and exhausting indoors.</td>
</tr>
<tr>
<td>(b) One (1) Empire shot blast unit, identified as SB2, constructed in 2005, with a maximum capacity of 2480 lbs/hr of glass bead media, using baghouse CE6 as control, and exhausting to the indoors.</td>
</tr>
<tr>
<td>(c) One (1) Gibson shot blast unit, identified as SB3, constructed in 2003, with a maximum capacity of 7920 lbs/hr of steel shot, using baghouse CE7 as control, and exhausting to the indoors.</td>
</tr>
<tr>
<td>(d) One (1) Goff shot blast unit, identified as SB4, constructed in 2003, with a maximum capacity of 3234 lbs/hr of steel shot, using baghouse CE8 as control, and exhausting to the indoors.</td>
</tr>
<tr>
<td>(e) Two (2) LS shot blast units, identified as SB5 and SB6, constructed in 2003, with a maximum capacity of 1294 lbs/hr of steel shot each, using baghouse CE10 and CE11, respectively, as control, and exhausting to the indoors.</td>
</tr>
<tr>
<td>(f) Four (4) Pauli shot blast units, identified as SB7, SB8, SB12, SB13, constructed in 2003, with a maximum capacity of 424 lbs/hr of glass bead media each, using baghouse CE12, CE13, CE16, and CE17, respectively, as control, and exhausting to the indoors.</td>
</tr>
<tr>
<td>(g) One (1) Empire barrel blaster, identified as SB10, constructed in 2003, with a maximum capacity of 1030 lbs/hr of steel shot, using baghouse CE14 as control, and exhausting to the indoors.</td>
</tr>
</tbody>
</table>
(h) One (1) shot blast unit, identified as SB11, constructed in 2003, with a maximum capacity of 530 lbs/hr of aluminum oxide, using baghouse CE18 as control, and exhausting to the indoors.

(i) One (1) Guyson shot blast unit, identified as SB14, constructed in 2003, with a maximum capacity of 530 lbs/hr of aluminum oxide, using baghouse CE15 as control, and exhausting to the indoors.

(j) One (1) Pauli shot blast unit, identified as SB15, constructed in 2005, with a maximum capacity of 259 lbs/hr of soda blast media, using baghouse CE20 as control, and exhausting to the indoors.

(k) One (1) wheelabrator, identified as SB16, constructed in 2003, with a maximum capacity of 31,769 lbs/hr of steel grit, using baghouse CE21 as control, and exhausting to the indoors.

(l) One (1) wheelabrator, identified as SB17, approved in 2019 for construction, with a maximum capacity of 26,474 lb/hr of steel shot, using baghouse CE22 as control, and exhausting indoors.

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

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

D.1.1 Particulate Matter (PM) Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from each of the shot blast units shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.1.2 FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The one (1) wheelabrator, identified as SB17, shall be limited to less than 4,000 operational hours per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) PM, PM10, and PM2.5 emissions (after control) from the shot blast units shall not exceed the limits contained in the table below:

<table>
<thead>
<tr>
<th>Shot Blast Units</th>
<th>PM Emission Limit (lbs/hr)</th>
<th>PM10 and PM2.5 Emission Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>S8</td>
<td>0.21</td>
<td>0.17</td>
</tr>
<tr>
<td>S9</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>S10</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>S11</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>S12</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td>S13</td>
<td>0.17</td>
<td>0.17</td>
</tr>
</tbody>
</table>
Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period, PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1)][326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Conditions D.1.1 and D.1.2, not later than five (5) years from the most recent compliance stack test for one (1) of the emission units (after control) within Group 1 as specified listed in the following table, the Permittee shall perform PM, PM10, and PM2.5 testing for one (1) of the emission units (after control) within Group 1 as specified listed in the following table, at least once every five (5) years from the date of the most recent valid compliance demonstration, utilizing methods as approved by the Commissioner. The source will test the emission unit for which the longest period of time has passed since the last valid compliance test for the Group 1 emission units listed in the following table. In addition to these requirements, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 include filterable and condensable particulate matter.

<table>
<thead>
<tr>
<th>EMISSION UNIT GROUPINGS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit ID</td>
</tr>
<tr>
<td>------------------</td>
</tr>
<tr>
<td>SB1</td>
</tr>
<tr>
<td>SB2</td>
</tr>
<tr>
<td>SB3</td>
</tr>
</tbody>
</table>

(b) In order to demonstrate compliance status with conditions D.1.1 and D.1.2, not later than five (5) years from the most recent compliance stack test, the Permittee shall perform PM, PM10, and PM2.5 testing on the one (1) wheelabrator, identified as SB16, (after control) at least once every five (5) years from the date of the most recent valid compliance demonstration, utilizing methods as approved by the Commissioner.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance testing contains the Permittee's obligation with regard to the performance testing required by this condition.
PM10 and PM2.5 include filterable and condensable particulate matter.

In order to demonstrate compliance status with Conditions D.1.1 and D.1.2, not later than one hundred eighty (180) days after the initial startup of the one (1) wheelabrator, identified as SB17, the Permittee shall conduct PM, PM10 and PM2.5 testing on the one (1) wheelabrator, identified as SB17, controlled by baghouse CE22, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable particulate matter.

D.1.8 Record Keeping Requirements

(a)

To document the compliance status with Condition D.1.2(a), the Permittee shall maintain records of the hours of operation of shotblaster SB17.

To document the compliance status with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6.

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

D.1.9 Reporting Requirements

Quarterly summaries of the information to document compliance status with Condition D.1.2(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(3) A Quarterly Report form has been added for the hours of operation for proposed shotblaster SB17 as follows:

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

FESOP Quarterly Report

Source Name: McCoy Investments dba\ IDS Blast Finishing
Current Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219
FESOP Permit No.: F097-41235-00524
Facility: Wheelabrator SB17
**Parameter:** Hours of Operation  
**Limit:** The one (1) wheelabrator, identified as SB17, shall be limited to less than 4,000 operational hours per twelve (12) consecutive month period.

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Hours of operation</td>
<td>Hours of operation</td>
<td>Hours of operation</td>
</tr>
<tr>
<td></td>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- [ ] No deviation occurred in this quarter.
- [ ] Deviation/s occurred in this quarter.
  Deviation has been reported on: _________________

Submitted by: ____________________________________________  
Title / Position: ____________________________________________  
Signature: ________________________________________________  
Date: _____________________________________________________  
Phone: ____________________________________________________

**Additional Changes**

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

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

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

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

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

<table>
<thead>
<tr>
<th>Condition</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>(l)</td>
<td>One (1) paint booth, identified as SC2, constructed in 2014, with a maximum capacity of 0.333 units per hour, using dry filters as control, identified as CE2, for control, and exhausting to stack S11 and S18.</td>
</tr>
<tr>
<td>(m)</td>
<td>One (1) powder coating booth, identified as SC3, constructed in 2014, with a maximum capacity of 200 pounds per hour of powder coating, using dry filters as control, identified as CE3, and exhausting to the indoors.</td>
</tr>
<tr>
<td>(n)</td>
<td>One (1) dip tank, identified as SC4, constructed in 2005, with a maximum capacity of 0.11 gallons of coating per hour.</td>
</tr>
<tr>
<td>(o)</td>
<td>One (1) roll coating operation, identified as SC5, constructed in 2002, with a maximum capacity of 1.15 gallons of coating per hour.</td>
</tr>
</tbody>
</table>

Under 40 CFR Part 60, Subpart EE, emission units SC2, SC4, and SC5 are considered affected facilities.

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

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

#### D.2.8 Monitoring

<table>
<thead>
<tr>
<th>Condition</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>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 powder coating booth (SC3) while the booth is in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.</td>
</tr>
<tr>
<td>(b)</td>
<td>Monthly inspections shall be performed of the coating emissions from the stack and for the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.</td>
</tr>
</tbody>
</table>

#### D.2.9 Record Keeping Requirements

<table>
<thead>
<tr>
<th>Condition</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>To document the compliance status with Condition D.2.1(b)(3), the Permittee shall maintain a record of any actions taken if overspray is visibly detected.</td>
</tr>
</tbody>
</table>
| (b)       | To document the compliance status with condition D.2.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections. To document the compliance status with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2)
shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.2.3.

(1) The VOC content of each coating material used less water.

(2) The amount of each coating material and solvent used on daily 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 solvent.

(c) To document the compliance status with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.2.3.

(1) The VOC content of each coating material used less water.

(2) The amount of each coating material and solvent used on daily 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 solvent.

To document the compliance status with Condition D.2.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 22, 2019.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 097-41235-00524. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact L. David Cohen, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-0178 or (800) 451-6027, and ask for L. David Cohen or (317) 233-9327.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
# Uncontrolled Emissions Source Wide

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shot Blasting</td>
<td>1,620</td>
<td>1,421</td>
<td>1,421</td>
<td></td>
<td></td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Surface Coating</td>
<td>444.0</td>
<td>444.0</td>
<td>444.0</td>
<td>-</td>
<td></td>
<td>28.20</td>
<td>-</td>
<td>8.42</td>
<td>5.83 Xylene</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.09</td>
<td>0.36</td>
<td>0.36</td>
<td>0.03</td>
<td>4.68</td>
<td>0.26</td>
<td>3.94</td>
<td>0.09</td>
<td>0.08 Hexane</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>2,064</td>
<td>1,865</td>
<td>1,865</td>
<td>0.03</td>
<td>4.68</td>
<td>28.46</td>
<td>3.94</td>
<td>8.50</td>
<td>5.83 Xylene</td>
</tr>
</tbody>
</table>

# Limited and Controlled Emissions Source Wide

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shot Blasting</td>
<td>85.4</td>
<td>75.5</td>
<td>75.5</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Surface Coating</td>
<td>9.06</td>
<td>9.06</td>
<td>9.06</td>
<td>-</td>
<td>-</td>
<td>28.20</td>
<td>-</td>
<td>8.42</td>
<td>5.83 Xylene</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.09</td>
<td>0.36</td>
<td>0.36</td>
<td>0.03</td>
<td>4.68</td>
<td>0.26</td>
<td>3.94</td>
<td>0.09</td>
<td>0.08 Hexane</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>94.6</td>
<td>84.9</td>
<td>84.9</td>
<td>0.03</td>
<td>4.68</td>
<td>28.46</td>
<td>3.94</td>
<td>8.50</td>
<td>5.83 Xylene</td>
</tr>
</tbody>
</table>
Appendix A: Emission Calculations

Abrasive Blasting - Confined

Shotblast Units Summary

Company Name: McCoy Investments dba IDS Blast Finishing
Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219
Permit Number: F097-41235-00524
Reviewer: L. David Cohen

<table>
<thead>
<tr>
<th>Shotblast Unit</th>
<th>Unlimited Potential to Emit</th>
<th>Potential to Emit after Controls</th>
<th>Limited Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PM</td>
<td>PM10/PM2.5</td>
<td>PM</td>
</tr>
<tr>
<td></td>
<td>tons/year</td>
<td>tons/year</td>
<td>tons/year</td>
</tr>
<tr>
<td>SB1</td>
<td>79.64</td>
<td>79.64</td>
<td>0.08</td>
</tr>
<tr>
<td>SB2</td>
<td>101.54</td>
<td>79.64</td>
<td>0.10</td>
</tr>
<tr>
<td>SB3</td>
<td>138.76</td>
<td>119.33</td>
<td>1.39</td>
</tr>
<tr>
<td>SB4</td>
<td>56.66</td>
<td>48.73</td>
<td>0.57</td>
</tr>
<tr>
<td>SB5</td>
<td>22.68</td>
<td>19.50</td>
<td>0.23</td>
</tr>
<tr>
<td>SB6</td>
<td>22.68</td>
<td>19.50</td>
<td>0.23</td>
</tr>
<tr>
<td>SB7</td>
<td>18.58</td>
<td>18.58</td>
<td>0.02</td>
</tr>
<tr>
<td>SB8</td>
<td>18.58</td>
<td>18.58</td>
<td>0.02</td>
</tr>
<tr>
<td>SB10</td>
<td>45.13</td>
<td>45.13</td>
<td>0.05</td>
</tr>
<tr>
<td>SB11</td>
<td>23.23</td>
<td>23.23</td>
<td>0.02</td>
</tr>
<tr>
<td>SB12</td>
<td>18.58</td>
<td>18.58</td>
<td>0.02</td>
</tr>
<tr>
<td>SB13</td>
<td>18.58</td>
<td>18.58</td>
<td>0.02</td>
</tr>
<tr>
<td>SB14</td>
<td>23.23</td>
<td>23.23</td>
<td>0.02</td>
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<tr>
<td>SB15</td>
<td>11.33</td>
<td>11.33</td>
<td>0.01</td>
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<tr>
<td>SB16</td>
<td>556.59</td>
<td>478.67</td>
<td>11.13</td>
</tr>
<tr>
<td>SB17</td>
<td>463.82</td>
<td>398.89</td>
<td>9.28</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,620</strong></td>
<td><strong>1,421</strong></td>
<td><strong>23.17</strong></td>
</tr>
</tbody>
</table>
## Appendix A: Emission Calculations

### Abrasive Blasting - Confined

**Company Name:** McCoy Investments dba IDS Blast Finishing  
**Source Address:** 2717 Tobey Drive, Indianapolis, Indiana 46219  
**Permit Number:** F097-41235-00524  
**Reviewer:** L. David Cohen

### Emission Calculations

#### Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>LB PM / LB abrasive</th>
<th>LB PM10 / LB PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
</tr>
</tbody>
</table>

#### Table 2 - Density of Abrasives (lb/ft³)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al oxides</td>
<td>125</td>
</tr>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
</tr>
<tr>
<td>Soda</td>
<td>61</td>
</tr>
<tr>
<td>Soft Shot</td>
<td>225</td>
</tr>
<tr>
<td>Glass Bead</td>
<td>100</td>
</tr>
<tr>
<td>Star Blast</td>
<td>143</td>
</tr>
</tbody>
</table>

#### Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate (FR1) of sand through a blasting nozzle as a function of nozzle pressure and internal diameter (ID1)

<table>
<thead>
<tr>
<th>Nozzle Type (diameter)</th>
<th>Internal diameter, in</th>
<th>No. 2 (1/8 inch)</th>
<th>No. 3 (3/16 inch)</th>
<th>No. 4 (1/4 inch)</th>
<th>No. 5 (5/16 inch)</th>
<th>No. 6 (3/8 inch)</th>
<th>No. 7 (7/16 inch)</th>
<th>No. 8 (1/2 inch)</th>
<th>No. 10 (5/8 inch)</th>
<th>No. 12 (3/4 inch)</th>
<th>No. 16 (1 inch)</th>
</tr>
</thead>
<tbody>
<tr>
<td>30</td>
<td>0.125</td>
<td>28</td>
<td>0.375</td>
<td>0.4375</td>
<td>0.625</td>
<td>0.75</td>
<td>1.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>40</td>
<td>0.125</td>
<td>28</td>
<td>0.375</td>
<td>0.4375</td>
<td>0.625</td>
<td>0.75</td>
<td>1.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>50</td>
<td>0.125</td>
<td>28</td>
<td>0.375</td>
<td>0.4375</td>
<td>0.625</td>
<td>0.75</td>
<td>1.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>60</td>
<td>0.125</td>
<td>28</td>
<td>0.375</td>
<td>0.4375</td>
<td>0.625</td>
<td>0.75</td>
<td>1.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>70</td>
<td>0.125</td>
<td>28</td>
<td>0.375</td>
<td>0.4375</td>
<td>0.625</td>
<td>0.75</td>
<td>1.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>80</td>
<td>0.125</td>
<td>28</td>
<td>0.375</td>
<td>0.4375</td>
<td>0.625</td>
<td>0.75</td>
<td>1.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>90</td>
<td>0.125</td>
<td>28</td>
<td>0.375</td>
<td>0.4375</td>
<td>0.625</td>
<td>0.75</td>
<td>1.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100</td>
<td>0.125</td>
<td>28</td>
<td>0.375</td>
<td>0.4375</td>
<td>0.625</td>
<td>0.75</td>
<td>1.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Calculations

#### Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)

\[
D_1 = \text{Density of sand from Table 2} = 99 \text{ lb/ft}^3
\]

\[
I_{D1} = \text{Internal diameter of nozzle for sand blasting from Table 3} = 0.375 \text{ inch}
\]

\[
F_{R1} = \text{Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3} = 720 \text{ lb/hr}
\]

\[
D = \text{Density of actual abrasive} = 125 \text{ lb/ft}^3
\]

\[
I_{D} = \text{Internal diameter of actual nozzle} = 0.375 \text{ inch}
\]

\[
F_{R} = \text{Flow rate of actual abrasive (lb/hr)} = 909.1 \text{ lb/hr (per nozzle)}
\]

#### Potential to Emit Before Control

\[
F_R = \text{Flow rate of actual abrasive (lb/hr)} = 909.1 \text{ lb/hr (per nozzle)}
\]

\[
w = \text{Fraction of time of wet blasting} = 0 \%
\]

\[
N = \text{Number of nozzles} = 2
\]

\[
E_F = \text{PM emission factor for actual abrasive from Table 1} = 0.010 \text{ lb PM/ lb abrasive}
\]

\[
PM10 = \text{PM10 emission factor ratio for actual abrasive from Table 1} = 1.00 \text{ lb PM10 / lb PM}
\]

Potential to Emit (before control) = \[
\]

\[
\text{Potential to Emit (after control)} = \text{Potential to Emit (before control)} \times (1 - \text{Control efficiency})
\]

Potential to Emit (tons/year) = Potential to Emit (lbs/hour) \times 8760 \text{ hours/year} \times \frac{1 \text{ ton}}{2000 \text{ lb}}

### Methodology


Flow rate of actual abrasive (FR) (lb/hr) = \[
F_{R1} \times (I_{D/D1})^{2} \times (D/D1)
\]

Potential to Emit (before control) = \[
E_F \times F_R \times (1 - w/200) \times N
\]

Where w should be entered in as a whole number (if w is 50%, enter 50)

Potential to Emit (after control) = Potential to Emit (before control) \times (1 - control efficiency)

Potential to Emit (tons/year) = Potential to Emit (lbs/hour) \times 8760 \text{ hours/year} \times \frac{1 \text{ ton}}{2000 \text{ lb}}
Appendix A: Emission Calculations

Abrasive Blasting - Confined

Company Name: McCoy Investments dba IDS Blast Finishing
Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219
Permit Number: F097-41235-00524
Reviewer: L. David Cohen

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Emission Factor (EF)</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
<td></td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
<td></td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.96</td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
<td></td>
</tr>
</tbody>
</table>

Table 2 - Density of Abrasives (lb/ft³)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al oxides</td>
<td>125</td>
</tr>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
</tr>
<tr>
<td>Soda</td>
<td>61</td>
</tr>
<tr>
<td>Soft Shot</td>
<td>225</td>
</tr>
<tr>
<td>Glass Bead</td>
<td>100</td>
</tr>
<tr>
<td>Star Blast</td>
<td>143</td>
</tr>
</tbody>
</table>

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

<table>
<thead>
<tr>
<th>Nozzle Type (diameter)</th>
<th>Internal diameter, in</th>
<th>Nozzle Pressure (psig)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. 2 (1/8 inch)</td>
<td>0.125</td>
<td>30</td>
</tr>
<tr>
<td>No. 3 (3/16 inch)</td>
<td>0.1875</td>
<td>40</td>
</tr>
<tr>
<td>No. 4 (1/4 inch)</td>
<td>0.25</td>
<td>50</td>
</tr>
<tr>
<td>No. 5 (5/16 inch)</td>
<td>0.3125</td>
<td>60</td>
</tr>
<tr>
<td>No. 6 (3/8 inch)</td>
<td>0.375</td>
<td>70</td>
</tr>
<tr>
<td>No. 7 (7/16 inch)</td>
<td>0.4375</td>
<td>80</td>
</tr>
<tr>
<td>No. 8 (1/2 inch)</td>
<td>0.5</td>
<td>90</td>
</tr>
<tr>
<td>No. 10 (5/8 inch)</td>
<td>0.625</td>
<td>100</td>
</tr>
<tr>
<td>No. 12 (3/4 inch)</td>
<td>0.75</td>
<td>110</td>
</tr>
<tr>
<td>No. 16 (1 inch)</td>
<td>1</td>
<td>120</td>
</tr>
</tbody>
</table>

CALCULATIONS

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)

FR1 = Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3 = 255 lb/hr

D = Density of actual abrasive = 100 lb/ft³

D1 = Density of sand from Table 2 = 99 lb/ft³

ID1 = Internal diameter of nozzle for sand blasting from Table 3 = 0.25 inch

Potential to Emit Before Control

FR = Flow rate of actual abrasive (lb/hr) = 257.6 lb/hr (per nozzle)

w = fraction of time of wet blasting = 0 %

N = number of nozzles = 9

EF = PM emission factor for actual abrasive from Table 1 = 0.010 lb PM / lb abrasive

PM10 emission factor ratio for actual abrasive from Table 1 = 1.00 lb PM10 / lb PM

PM PM10
Potential to Emit (before control) = 23.182 23.182 lb/hr
= 556.36 556.36 lb/day
= 101.54 101.54 ton/yr

Potential to Emit After Control

Emission Control Device Efficiency = 99.9%

Potential to Emit (after control) = 2.3E-02 2.3E-02 lb/hr
= 0.556 0.556 lb/day
= 0.102 0.102 ton/yr

Limited Potential to Emit

Limited Emission Control Device Efficiency = 96.0%

Limited Potential to Emit = 9.3E-01 9.3E-01 lb/hr
= 22.255 22.255 lb/day
= 4.061 4.061 ton/yr

METHODOLOGY


Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)^2 x (D/D1)

Potential to Emit (before control) = EF x FR x (1 - w/200) x N

Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [3760 hours/year] x [ton/2000 lbs]
Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
</tr>
</tbody>
</table>

Potential to Emit Before Control

- **FR** = Flow rate of actual abrasive (lb/hr) = 7920 lb/hr (per nozzle)
- **w** = fraction of time of wet blasting = 0%
- **N** = number of nozzles = 1
- **EF** = PM emission factor for actual abrasive from Table 1 = 0.004 lb PM/lb abrasive
- **PM10 emission factor ratio for actual abrasive from Table 1** = 0.86 lb PM10/lb PM

Potential to Emit (before control) = 31.7 lb/hr = 760.3 lb/day = 138.8 ton/yr

Potential to Emit After Control

- Emission Control Device Efficiency = 99.0% 99.0%
- Potential to Emit (after control) = 0.32 lb/hr = 7.60 lb/day = 1.39 ton/yr

Limited Potential to Emit

- Limited Emission Control Device Efficiency = 96.0% 96.0%
- Limited Potential to Emit = 1.27 lb/hr = 30.41 lb/day = 5.55 ton/yr

METHODOLOGY

- Potential to Emit (before control) = EF x FR x (1 - w/200) x N
  - (where w should be entered in as a whole number (if w is 50%, enter 50))
- Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]
- Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
Appendix A: Emission Calculations

Company Name: McCoy Investments dba IDS Blast Finishing
Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219
Permit Number: F097-41235-00524
Reviewer: L. David Cohen

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
</tr>
</tbody>
</table>

Potential to Emit Before Control

\[
\text{FR} = \text{Flow rate of actual abrasive (lb/hr)} = 3234 \text{ lb/hr (per nozzle)}
\]
\[
w = \text{fraction of time of wet blasting} = 0 \%
\]
\[
N = \text{number of nozzles} = 1
\]
\[
\text{EF} = \text{PM emission factor for actual abrasive from Table 1} = 0.004 \text{ lb PM / lb abrasive}
\]
\[
\text{PM10 emission factor ratio for actual abrasive from Table 1} = 0.86 \text{ lb PM10 / lb PM}
\]

Potential to Emit (before control) = $3234 \times 0.004 \times 0.86 \times 1 = 12.9 \text{ lb/hr}$

$12.9 \times 24 \times 365 \times 0.86 = 56.7 \text{ ton/yr}$

Potential to Emit After Control

\[
\text{Emission Control Device Efficiency} = 99.9\%
\]

Potential to Emit (after control) = $12.9 \times 0.01 = 0.13 \text{ lb/hr}$

$0.13 \times 24 \times 365 \times 0.86 = 3.10 \text{ ton/yr}$

Limited Potential to Emit

\[
\text{Limited Emission Control Device Efficiency} = 96.0\%
\]

Limited Potential to Emit = $12.9 \times 0.04 = 0.52 \text{ lb/hr}$

$0.52 \times 24 \times 365 \times 0.86 = 2.27 \text{ ton/yr}$

METHODOLOGY


Potential to Emit (before control) = $\text{EF} \times \text{FR} \times (1 - w/200) \times N$

Potential to Emit (after control) = $\text{Potential to Emit (before control)} \times [1 - \text{control efficiency}]$

Potential to Emit (tons/year) = $\text{Potential to Emit (lbs/hour)} \times [8760 \text{ hours/year}] \times [\text{ton/2000 lbs}]$
Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
</tr>
</tbody>
</table>

Potential to Emit Before Control

\[
PM = Flow rate of actual abrasive (lb/hr) = 1294 lb/hr (per nozzle) \\
w = fraction of time of wet blasting = 0 % \\
N = number of nozzles = 1 \\
EF = PM emission factor for actual abrasive from Table 1 = 0.004 lb PM / lb abrasive \\
PM10 emission factor ratio for actual abrasive from Table 1 = 0.86 lb PM10 / lb PM \\
\]

PM PM10

Individual Potential to Emit (before control) = 5.2 4.5 lb/hr

= 124.3 106.9 lb/day

= 22.7 19.5 ton/yr

Total PTE (SB5 & SB6) = 45.4 39.0

Potential to Emit After Control

Emission Control Device Efficiency = 99.0% 99.0%

Individual Potential to Emit (after control) = 0.05 0.04 lb/hr

= 1.24 1.07 lb/day

= 0.23 0.20 ton/yr

Total PTE (SB5 & SB6) = 0.45 0.39

Limited Potential to Emit

Limited Emission Control Device Efficiency = 96.0% 96.0%

Limited Potential to Emit = 4.97 4.27 lb/day

= 0.91 0.78 ton/yr

Total PTE (SB5 & SB6) = 1.81 1.56

METHODOLOGY


Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
## Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
<th>MP emission factor</th>
<th>PM10 emission factor ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>All oxides</td>
<td>0.041</td>
<td>0.70</td>
<td>15.6</td>
<td>1.00</td>
</tr>
<tr>
<td>Sand</td>
<td>0.010</td>
<td>0.70</td>
<td>95.5</td>
<td>1.00</td>
</tr>
<tr>
<td>Grit</td>
<td>0.004</td>
<td>0.86</td>
<td>73.4</td>
<td>1.00</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.010</td>
<td>1.00</td>
<td>62.3</td>
<td>1.00</td>
</tr>
<tr>
<td>Others</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## Table 2 - Density of Abrasives (lb/ft³)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>All oxides</td>
<td>99</td>
</tr>
<tr>
<td>Sand</td>
<td>487</td>
</tr>
<tr>
<td>Steel</td>
<td>61</td>
</tr>
<tr>
<td>Soda</td>
<td>225</td>
</tr>
<tr>
<td>Glass Blast</td>
<td>100</td>
</tr>
<tr>
<td>Star Blast</td>
<td>143</td>
</tr>
</tbody>
</table>

## Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

<table>
<thead>
<tr>
<th>Nozzle Type (diameter)</th>
<th>Nozzle Pressure (psig)</th>
<th>Flow rate (FR1) (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. 2 (1/8 inch)</td>
<td>30</td>
<td>21.8</td>
</tr>
<tr>
<td>No. 3 (3/16 inch)</td>
<td>35</td>
<td>25.8</td>
</tr>
<tr>
<td>No. 4 (1/4 inch)</td>
<td>42</td>
<td>33.8</td>
</tr>
<tr>
<td>No. 5 (5/16 inch)</td>
<td>47</td>
<td>37.8</td>
</tr>
<tr>
<td>No. 6 (3/8 inch)</td>
<td>55</td>
<td>49.8</td>
</tr>
<tr>
<td>No. 7 (7/16 inch)</td>
<td>63</td>
<td>55.8</td>
</tr>
<tr>
<td>No. 8 (1/2 inch)</td>
<td>70</td>
<td>62.8</td>
</tr>
<tr>
<td>No. 9 (5/8 inch)</td>
<td>77</td>
<td>70.8</td>
</tr>
<tr>
<td>No. 10 (3/4 inch)</td>
<td>83</td>
<td>77.8</td>
</tr>
<tr>
<td>No. 11 (7/8 inch)</td>
<td>90</td>
<td>83.8</td>
</tr>
<tr>
<td>No. 12 (1 inch)</td>
<td>99</td>
<td>90.9</td>
</tr>
</tbody>
</table>

### Calculations

**Adjusting Flow Rates for Different Abrasives and Nozzle Diameters**

\[
\text{FR} = \frac{\text{Flow Rate (FR1) of abrasive at nozzle pressure and internal nozzle diameter (ID1)}}{\left(\frac{\text{ID}}{\text{ID1}}\right)^2} \\
\text{D1} = \text{Density of sand from Table 2} = 99 \text{ lb/ft}^3 \\
\text{ID1} = \text{Internal diameter of nozzle for sand blasting from Table 3} = 0.3125 \text{ inch} \\
\text{FR1} = \text{Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3} = 420 \text{ lb/hr} \\
\text{D} = \frac{\text{Density of actual abrasive}}{\text{Density of sand}} = 100 \text{ lb/ft}^3 \\
\text{ID} = \text{Internal diameter of actual nozzle} = 0.3125 \text{ inch} \\
\text{FR} = \frac{\text{Flow rate of actual abrasive (lb/hr)}}{} = 424.2 \text{ lb/hr (per nozzle)}
\]

### Potential to Emit Before Control

\[
\begin{align*}
\text{FR} &= \text{Flow rate of actual abrasive (lb/hr)} = 424.2 \text{ lb/hr (per nozzle)} \\
\text{w} &= \text{Fraction of time of wet blasting} = 0 \% \\
\text{N} &= \text{Number of nozzles} = 1 \\
\text{EF} &= \text{PM emission factor for actual abrasive from Table 1} = 0.010 \text{ lb PM/lb abrasive} \\
\text{PM10 emission factor ratio for actual abrasive from Table 1} &= 1.00 \text{ lb PM10/lb PM} \\
\text{Potential to Emit (before control)} &= \text{FR} \times \text{w} \times \text{N} \times \text{EF} = 424.2 \times 0.010 \times 1 = 4.242 \text{ lb/hr} \\
\text{Potential to Emit (after control)} &= \text{Potential to Emit (before control)} \times (1 - \text{control efficiency}) = 4.242 \times (1 - 0.99) = 0.102 \text{ lb/hr} \\
\text{Potential to Emit (tons/year)} &= \text{Potential to Emit (lbs/hour)} \times 8760 \text{ hours/year} \times \frac{\text{ton}}{2000 \text{ lbs}} = 4.242 \times 8760 \times \frac{1}{2000} = 19.58 \text{ ton/yr}
\end{align*}
\]

**Total (SB7, SB8, SB12, SB13)** = 74.33 ton/yr

### Potential to Emit After Control

\[
\begin{align*}
\text{Emission Control Device Efficiency} &= 99.9\% \\
\text{Potential to Emit (after control)} &= \text{Potential to Emit (before control)} \times (1 - \text{control efficiency}) = 4.242 \times (1 - 0.99) = 0.102 \text{ lb/hr} \\
\text{Potential to Emit (tons/year)} &= \text{Potential to Emit (lbs/hour)} \times 8760 \text{ hours/year} \times \frac{\text{ton}}{2000 \text{ lbs}} = 0.102 \times 8760 \times \frac{1}{2000} = 0.019 \text{ ton/yr}
\end{align*}
\]

**Total (SB7, SB8, SB12, SB13)** = 0.074 ton/yr

### Limited Potential to Emit

\[
\begin{align*}
\text{Limited Emission Control Device Efficiency} &= 96.0\% \\
\text{Limited Potential to Emit (lb/hr)} &= \text{Potential to Emit (after control)} \times (1 - \text{limit control efficiency}) = 4.073 \times (1 - 0.96) = 0.243 \text{ lb/hr} \\
\text{Limited Potential to Emit (tons/year)} &= \text{Limited Potential to Emit (lbs/hour)} \times 8760 \text{ hours/year} \times \frac{\text{ton}}{2000 \text{ lbs}} = 0.243 \times 8760 \times \frac{1}{2000} = 0.074 \text{ ton/yr}
\end{align*}
\]

**Total (SB7, SB8, SB12, SB13)** = 2.973 ton/yr

### Methodology


Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)² x (ID1)

Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = [Potential to Emit (before control) * (1 - control efficiency)]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
# Appendix A: Emission Calculations

**Company Name:** McCoy Investments dba IDS Blast Finishing  
**Source Address:** 2717 Tobey Drive, Indianapolis, Indiana 46219  
**Permit Number:** F997-41235-00524  
**Reviewer:** L. David Cohen

## Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>PM / lb abrasive</th>
<th>PM10 / lb PM</th>
<th>Al oxides</th>
<th>( \text{PM} )</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
<td>125</td>
<td>99</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
<td>487</td>
<td>61</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
<td>225</td>
<td>100</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
<td>500</td>
<td>500</td>
</tr>
</tbody>
</table>

## Table 2 - Density of Abrasives (lb/ft³)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soft Shot</td>
<td>225</td>
</tr>
<tr>
<td>Soft Shot</td>
<td>100</td>
</tr>
<tr>
<td>Star Blast</td>
<td>143</td>
</tr>
<tr>
<td>Glass Bead</td>
<td>100</td>
</tr>
</tbody>
</table>

## Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

<table>
<thead>
<tr>
<th>Nozzle Type (diameter)</th>
<th>Nozzle Pressure (psig)</th>
<th>Flow rate (FR1) of sand through a blasting nozzle as a function of nozzle pressure and internal diameter (ID1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. 2 (1/8 inch)</td>
<td>0.125</td>
<td>28 40 50 60 70 80 90 100</td>
</tr>
<tr>
<td>No. 3 (3/16 inch)</td>
<td>0.1875</td>
<td>65 80 94 107 122 135 149 165</td>
</tr>
<tr>
<td>No. 4 (1/4 inch)</td>
<td>0.25</td>
<td>109 138 168 195 221 255 280 309</td>
</tr>
<tr>
<td>No. 5 (5/16 inch)</td>
<td>0.3125</td>
<td>209 247 282 314 345 377 409 442</td>
</tr>
<tr>
<td>No. 6 (3/8 inch)</td>
<td>0.375</td>
<td>285 355 417 477 540 600 657 720</td>
</tr>
<tr>
<td>No. 7 (7/16 inch)</td>
<td>0.4375</td>
<td>385 472 560 645 735 820 905 940</td>
</tr>
<tr>
<td>No. 8 (1/2 inch)</td>
<td>0.5</td>
<td>503 615 725 835 945 1050 1160 1270</td>
</tr>
<tr>
<td>No. 10 (5/8 inch)</td>
<td>0.625</td>
<td>620 995 1170 1345 1510 1680 1850 2020</td>
</tr>
<tr>
<td>No. 12 (3/4 inch)</td>
<td>0.75</td>
<td>750 1140 1420 1797 2100 2400 2630 2880</td>
</tr>
<tr>
<td>No. 16 (1 inch)</td>
<td>1</td>
<td>2030 2460 2900 3340 3780 4200 4640 5090</td>
</tr>
</tbody>
</table>

## Calculations

### Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abraasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)

\[
D_1 = \text{Density of sand from Table 2} = 99 \text{ lb/ft}^3
\]

\[
ID_1 = \text{Internal diameter of nozzle for sand blasting from Table 3} = 0.25 \text{ inch}
\]

\[
FR_1 = \text{Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3} = 255 \text{ lb/hr}
\]

\[
D = \text{Density of actual abrasive} = 100 \text{ lb/ft}^3
\]

\[
ID = \text{Internal diameter of actual nozzle} = 0.25 \text{ inch}
\]

\[
FR = \text{Flow rate of actual abrasive (lb/hr)} = \frac{255}{0.25} = 257.6 \text{ lb/hr (per nozzle)}
\]

### Potential to Emit Before Control

\[
FR = \text{Flow rate of actual abrasive (lb/hr)} = 257.6 \text{ lb/hr (per nozzle)}
\]

\[
w = \text{Fraction of time of wet blasting} = 0\%
\]

\[
N = \text{Number of nozzles} = 4
\]

\[
EF = \text{PM emission factor for actual abrasive from Table 1} = 0.010 \text{ lb PM/lb abrasive}
\]

\[
PM10 = \text{PM10 emission factor ratio for actual abrasive from Table 1} = 1.00 \text{ lb PM10 / lb PM}
\]

\[
\text{Potential to Emit (before control)} = 10.303 \text{ lb/hr}
\]

\[
\text{Potential to Emit (after control)} = \frac{10.303}{0.999} = 10.303 \text{ lb/hr}
\]

\[
\text{Potential to Emit (before control)} = 247.27 \text{ lb/day}
\]

\[
\text{Potential to Emit (after control)} = \frac{247.27}{0.999} = 247.27 \text{ lb/day}
\]

\[
\text{Potential to Emit (tons/year)} = \frac{247.27}{8760} \times 2000 = 500 \text{ ton/yr}
\]

### Limited Potential to Emit

\[
\text{Limited Potential to Emit} = 4.1E-01 \text{ lb/hr}
\]

\[
\text{Limited Potential to Emit} = 9.891 \text{ lb/day}
\]

\[
\text{Limited Potential to Emit} = 1.805 \text{ ton/yr}
\]

### METHODOLOGY


Flow rate of actual abrasive (FR) = \( FR_1 \times (ID/ID_1)^2 \times (D/D_1) \) (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (before control) = \( EF \times FR \times (1 - w/200) \times N \) (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = \( \text{Potential to Emit (before control)} \times [1 \text{ - control efficiency}] \)

Potential to Emit (tons/year) = \( \text{[Potential to Emit (lbs/hour)]  \times [8760 hours/year] \times [ton/2000 lbs]} \)
Appendix A: Emission Calculations

Ablasive Blasting - Confined

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>0.86</td>
</tr>
</tbody>
</table>

Table 2 - Density of Abrasives (lb/ft³)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Grit</td>
<td>487</td>
</tr>
<tr>
<td>Steel</td>
<td>61</td>
</tr>
<tr>
<td>Soda</td>
<td>125</td>
</tr>
<tr>
<td>Soft Shot</td>
<td>225</td>
</tr>
<tr>
<td>Glass Bead</td>
<td>100</td>
</tr>
<tr>
<td>Star Blast</td>
<td>143</td>
</tr>
</tbody>
</table>

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

<table>
<thead>
<tr>
<th>Nozzle Type (diameter)</th>
<th>Internal diameter, in</th>
<th>No. 2 (1/8 inch)</th>
<th>No. 3 (3/16 inch)</th>
<th>No. 4 (1/4 inch)</th>
<th>No. 5 (5/16 inch)</th>
<th>No. 6 (3/8 inch)</th>
<th>No. 7 (7/16 inch)</th>
<th>No. 8 (1/2 inch)</th>
<th>No. 9 (5/8 inch)</th>
<th>No. 10 (7/8 inch)</th>
<th>No. 11 (1 inch)</th>
<th>No. 12 (1 1/4 inch)</th>
<th>No. 13 (1 1/2 inch)</th>
<th>No. 14 (1 3/4 inch)</th>
<th>No. 15 (2 inch)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. 2 (1/8 inch)</td>
<td>0.125</td>
<td>60</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
</tr>
<tr>
<td>No. 3 (3/16 inch)</td>
<td>0.1875</td>
<td>95</td>
<td>95</td>
<td>94</td>
<td>94</td>
<td>94</td>
<td>94</td>
<td>94</td>
<td>94</td>
<td>94</td>
<td>94</td>
<td>94</td>
<td>94</td>
<td>94</td>
<td>94</td>
</tr>
<tr>
<td>No. 5 (5/16 inch)</td>
<td>0.3125</td>
<td>205</td>
<td>205</td>
<td>204</td>
<td>204</td>
<td>204</td>
<td>204</td>
<td>204</td>
<td>204</td>
<td>204</td>
<td>204</td>
<td>204</td>
<td>204</td>
<td>204</td>
<td>204</td>
</tr>
<tr>
<td>No. 7 (7/16 inch)</td>
<td>0.4375</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
<td>385</td>
</tr>
<tr>
<td>No. 8 (1/2 inch)</td>
<td>0.5</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
<td>503</td>
</tr>
<tr>
<td>No. 9 (5/8 inch)</td>
<td>0.625</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
<td>620</td>
</tr>
<tr>
<td>No. 10 (7/8 inch)</td>
<td>0.75</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
<td>780</td>
</tr>
<tr>
<td>No. 11 (1 inch)</td>
<td>1</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
<td>2030</td>
</tr>
</tbody>
</table>

CALCULATIONS

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)

FR1 = Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3 = 420 lb/hr

FR = Flow rate of actual abrasive (lb/hr) = 530.3 lb/hr (per nozzle)

Potential to Emit Before Control

PM PM10

Potential to Emit (before control) = 5.303 5.303 lb/hr

= 127.27 127.27 lb/day

= 23.23 23.23 ton/yr

Potential to Emit After Control

Emission Control Device Efficiency = 99.9% 99.9%

PM10

Potential to Emit (after control) = 2.1E-01 2.1E-01 lb/hr

= 5.091 5.091 lb/day

= 0.029 0.029 ton/yr

Limited Potential to Emit

Limited Emission Control Device Efficiency = 96.0% 96.0%

PM

Limited Potential to Emit = 2.1E-01 2.1E-01 lb/hr

= 5.091 5.091 lb/day

= 0.029 0.029 ton/yr

METHODOLOGY


Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)^2 x (D/D1)

Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
Appendix A: Emission Calculations

Ablasive Blasting - Confined

Company Name: McCoy Investments dba IDS Blast Finishing
Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219
Permit Number: F97-41235-00524
Reviewer: L. David Cohen

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Emission Factor (EF)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
</tr>
</tbody>
</table>

Table 2 - Density of Abrasives (lb/ft³)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
</tr>
</tbody>
</table>

Table 3 - Sand Flow Rate (FR₁) Through Nozzle (lb/hr)

<table>
<thead>
<tr>
<th>Nozzle Type (diameter)</th>
<th>Internal diameter, in</th>
<th>No. 2 (1/8 inch)</th>
<th>No. 3 (3/16 inch)</th>
<th>No. 4 (1/4 inch)</th>
<th>No. 5 (5/16 inch)</th>
<th>No. 6 (3/8 inch)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>0.125</td>
<td>0.1875</td>
<td>0.25</td>
<td>0.3125</td>
<td>0.375</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.25</td>
<td>0.4375</td>
<td>0.5</td>
<td>0.625</td>
<td>0.75</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.375</td>
<td>2.030</td>
<td>1140</td>
<td>1420</td>
<td>1670</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2.030</td>
<td>2460</td>
<td>2900</td>
<td>3340</td>
<td>3780</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3340</td>
<td>4200</td>
<td>4640</td>
<td>5060</td>
<td></td>
</tr>
</tbody>
</table>

CALCULATIONS

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)

D₁ = Density of sand from Table 2 = 99 lb/ft³
ID₁ = Internal diameter of nozzle for sand blasting from Table 3 = 0.3125 inch
FR₁ = Sand flow rate at nozzle pressure and internal diameter (ID₁) from Table 3 = 420 lb/hr

D = Density of actual abrasive = 125 lb/ft³
ID = Internal diameter of actual nozzle = 0.3125 inch
FR = Flow rate of actual abrasive (lb/hr) = 530.3 lb/hr (per nozzle)

PM PM₁₀ Potential to Emit Before Control
FR = Flow rate of actual abrasive (lb/hr) = 530.3 lb/hr (per nozzle)
w = fraction of time of wet blasting = 0 %
N = number of nozzles = 1
EF = PM emission factor for actual abrasive from Table 1 = 0.010 lb PM/ lb abrasive
PM₁₀ emission factor ratio for actual abrasive from Table 1 = 1.00 lb PM/ lb PM

Potential to Emit (before control) = 5.303 lb/hr
Potential to Emit (after control) = 5.303 lb/hr
Potential to Emit (tons/year) = 5.303 lb/hr

Limited Potential to Emit
Limited Emission Control Device Efficiency = 99.9%
Limited Potential to Emit = 5.091 lb/hr
Limited Potential to Emit (tons/year) = 5.091 lb/hr

METHODOLOGY

Flow rate of actual abrasive (FR₁) (lb/hr) = FR₁ x (ID/ID₁)^2 x (D/D₁)
Potential to Emit (before control) = EF x FR x (1 - w/200) x N
Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]
Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
### Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Emission Factor (EF)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
</tr>
</tbody>
</table>

### Table 2 - Density of Abrasives (lb/ft³)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al oxides</td>
<td>125</td>
</tr>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
</tr>
<tr>
<td>Soda</td>
<td>61</td>
</tr>
<tr>
<td>Soft Shot</td>
<td>225</td>
</tr>
<tr>
<td>Glass Bead</td>
<td>100</td>
</tr>
<tr>
<td>Star Blast</td>
<td>143</td>
</tr>
</tbody>
</table>

### Table 3 - Sand Flow Rate (FR₁) Through Nozzle (lb/hr)

<table>
<thead>
<tr>
<th>Nozzle Type (diameter)</th>
<th>Internal diameter, in</th>
<th>30</th>
<th>40</th>
<th>50</th>
<th>60</th>
<th>70</th>
<th>80</th>
<th>90</th>
<th>100</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. 2 (1/8 inch)</td>
<td>0.125</td>
<td>28</td>
<td>35</td>
<td>42</td>
<td>49</td>
<td>55</td>
<td>63</td>
<td>70</td>
<td>77</td>
</tr>
<tr>
<td>No. 3 (3/16 inch)</td>
<td>0.1875</td>
<td>65</td>
<td>90</td>
<td>114</td>
<td>139</td>
<td>165</td>
<td>190</td>
<td>215</td>
<td>240</td>
</tr>
<tr>
<td>No. 4 (1/4 inch)</td>
<td>0.25</td>
<td>109</td>
<td>138</td>
<td>168</td>
<td>195</td>
<td>221</td>
<td>245</td>
<td>269</td>
<td>299</td>
</tr>
<tr>
<td>No. 5 (5/16 inch)</td>
<td>0.3125</td>
<td>205</td>
<td>247</td>
<td>292</td>
<td>354</td>
<td>371</td>
<td>420</td>
<td>462</td>
<td>507</td>
</tr>
<tr>
<td>No. 6 (3/8 inch)</td>
<td>0.375</td>
<td>285</td>
<td>355</td>
<td>417</td>
<td>477</td>
<td>540</td>
<td>600</td>
<td>657</td>
<td>720</td>
</tr>
<tr>
<td>No. 7 (7/16 inch)</td>
<td>0.4375</td>
<td>385</td>
<td>472</td>
<td>560</td>
<td>645</td>
<td>755</td>
<td>820</td>
<td>905</td>
<td>940</td>
</tr>
<tr>
<td>No. 8 (1/2 inch)</td>
<td>0.5</td>
<td>503</td>
<td>615</td>
<td>725</td>
<td>835</td>
<td>945</td>
<td>1050</td>
<td>1160</td>
<td>1265</td>
</tr>
<tr>
<td>No. 10 (5/8 inch)</td>
<td>0.625</td>
<td>826</td>
<td>996</td>
<td>1170</td>
<td>1336</td>
<td>1510</td>
<td>1680</td>
<td>1850</td>
<td>2030</td>
</tr>
<tr>
<td>No. 12 (3/4 inch)</td>
<td>0.75</td>
<td>1140</td>
<td>1420</td>
<td>1670</td>
<td>1915</td>
<td>2160</td>
<td>2400</td>
<td>2630</td>
<td>2880</td>
</tr>
<tr>
<td>No. 16 (1 inch)</td>
<td>1</td>
<td>2030</td>
<td>2450</td>
<td>2900</td>
<td>3340</td>
<td>3780</td>
<td>4200</td>
<td>4640</td>
<td>5065</td>
</tr>
</tbody>
</table>

### Calculations

#### Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID₁)

D₁ = Density of sand from Table 2 = 99 lb/ft³

ID₁ = Internal diameter of nozzle for sand blasting from Table 3 = 0.3125 inch

FR₁ = Sand flow rate at nozzle pressure and internal diameter (ID₁) from Table 3 = 420 lb/hr

D = Density of actual abrasive = 61 lb/ft³

ID = Internal diameter of actual nozzle = 0.3125 inch

FR = Flow rate of actual abrasive (lb/hr) = 258.8 lb/hr (per nozzle)

#### Potential to Emit Before Control

PM = EF x FR x (1 - w/200) x N

PM₁₀ = EF x FR x PM₁₀ emission factor ratio for actual abrasive from Table 1

#### Potential to Emit After Control

PM₁₀ after control = PM₁₀ x (1 - control efficiency)

#### Potential to Emit (tons/year)

PM₁₀ x 8760 hours/year x (ton/2000 lbs)

### Methodology


Flow rate of actual abrasive (FR) (lb/hr) = FR₁ x (ID₁/D₁)^2 x (D₁/ID₁)

Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = [Potential to Emit (before control)] x [1 - control efficiency]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
Company Name: McCoy Investments dba IDS Blast Finishing
Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219
Permit Number: F097-41235-00524
Reviewer: L. David Cohen

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
</tr>
</tbody>
</table>

METHODOLOGY


Potential to Emit (before control) = EF x FR x (1 - w/200) x N

Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
Appendix A: Emission Calculations

Company Name: McCoy Investments dba IDS Blast Finishing
Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219
Permit Number: F097-4I235-00524
Reviewer: L. David Cohen

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>PM</th>
<th>PM10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
</tr>
</tbody>
</table>

Potential to Emit Before Control

\[
FR = \text{Flow rate of actual abrasive (lb/hr)} = 26474 \text{ lb/hr (per nozzle)}
\]
\[
w = \text{fraction of time of wet blasting} = 0 \%
\]
\[
N = \text{number of nozzles} = 1
\]
\[
\text{EF} = \text{PM emission factor for actual abrasive from Table 1} = 0.004 \text{ lb PM/ lb abrasive}
\]
\[
\text{PM10 emission factor ratio for actual abrasive from Table 1} = 0.86 \text{ lb PM10 / lb PM}
\]

\[
\text{Potential to Emit (before control)} = 105.9 \times 91.1 \text{ lb/hr} = 2541.5 \times 2155.7 \text{ lb/day} = 463.8 \times 398.9 \text{ ton/yr}
\]

Potential to Emit After Control

\[
\text{Emission Control Device Efficiency} = 99.0\% \times 99.0\%
\]
\[
\text{Potential to Emit (after control)} = [\text{Potential to Emit (before control)}] \times [1 - \text{control efficiency}]
\]
\[
\text{Limited Potential to Emit} = 8.47 \times 7.29 \text{ lb/hr} = 406.64 \times 349.71 \text{ lb/day} = 37.11 \times 31.91 \text{ ton/yr}
\]

With 4,000hr operational limit = 19.56 \times 15.82 \text{ ton/yr}

METHODOLOGY


Potential to Emit (before control) = \text{EF} \times FR \times (1 - w/200) \times N

Potential to Emit (after control) = [\text{Potential to Emit (before control)}] \times [1 - \text{control efficiency}]

Potential to Emit (tons/year) = [\text{Potential to Emit (lb/hour)}] \times [8760 \text{ hours/year}] \times [1\text{ton/2000 lb}]
## Appendix A: Emission Calculations

**Surface Coating**

**Company Name:** McCoy Investments dba IDS Blast Finishing  
**Source Address:** 2117 Tooby Drive, Indianapolis, Indiana 46219  
**Permit Number:** FFB7-41235-00034  
**Reviewer:** L. David Cohen

<table>
<thead>
<tr>
<th></th>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Weight % Volatile (MID &amp; Organics)</td>
<td>30.14</td>
<td>32.26</td>
<td>30.14</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Weight % Water</td>
<td>30.14</td>
<td>21.20</td>
<td>30.14</td>
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<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
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</tr>
<tr>
<td>Weight % Organics</td>
<td>30.14</td>
<td>42.00</td>
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<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
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</tr>
<tr>
<td>Volume %</td>
<td>58.86%</td>
<td>84.70%</td>
<td>58.86%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
</tr>
<tr>
<td>Volume % Non-Volatile solids</td>
<td>30.14</td>
<td>17.20</td>
<td>30.14</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
<td>100.00%</td>
</tr>
<tr>
<td>Gal of flt. (gal/unit)</td>
<td>0.35</td>
<td>0.35</td>
<td>0.35</td>
<td>1.50</td>
<td>1.50</td>
<td>1.50</td>
<td>1.50</td>
<td>1.50</td>
<td>1.50</td>
<td>1.50</td>
<td>1.50</td>
</tr>
<tr>
<td>Maximum (unit/hour)</td>
<td>3.50</td>
<td>17.20%</td>
<td>3.50</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Pounds VOC per gallon of coating less water</td>
<td>3.50</td>
<td>17.20%</td>
<td>3.50</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Potential VOC pounds per hour</td>
<td>1.75</td>
<td>85%</td>
<td>1.75</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Potential VOC pounds per day</td>
<td>7.65</td>
<td>2.66</td>
<td>7.65</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Potential VOC tons per year</td>
<td>5.00</td>
<td>85%</td>
<td>5.00</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
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<td>0.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Potential VOC tons per month</td>
<td>0.42</td>
<td>17.20%</td>
<td>0.42</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
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</tr>
<tr>
<td>Potential VOC mms per year</td>
<td>2.60</td>
<td>85%</td>
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<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Particulate Potential Volatile Solids (TSP)</td>
<td>85%</td>
<td>17.20%</td>
<td>85%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>% VOC/Total Solids</td>
<td>85%</td>
<td>17.20%</td>
<td>85%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
</tbody>
</table>

### Methodology

- **Pounds of VOC per Gallon Coating less Water** = (Density (Lb/Gal) * Weight % Organics) / (1-Volume % water)
- **Potential VOC Pounds per Hour** = Pounds of VOC per Gallon coating (Lb/gal) * Gal of flt. (gal/unit) * Maximum (unit/hour)
- **Potential VOC Pounds per Day** = Potential VOC Pounds per hour * 24 hours
- **Potential VOC Tons per Year** = Potential VOC Pounds per Day / 2000 lbs
- **Particulate Potential Tons per Year** = Particulate Potential Volatile Solids (TSP) / 2000 lbs
- **% VOC/Total Solids** = % VOC per volume of coating / 100%
### Powder Coating Booth (SC3)

<table>
<thead>
<tr>
<th>Material</th>
<th>Maximum Coating Usage (lbs/hour)</th>
<th>Transfer Efficiency (%)</th>
<th>Uncontrolled Particulate (lbs/hr)</th>
<th>Uncontrolled Particulate (tons/yr)</th>
<th>Control Efficiency (%)</th>
<th>Potential Particulate (lbs/hr)</th>
<th>Potential Particulate (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tiger Drylac Powder Coating</td>
<td>200.00</td>
<td>50.00%</td>
<td>100.00</td>
<td>438.00</td>
<td>98.0%</td>
<td>2.0</td>
<td>8.76</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>438.00</strong></td>
<td><strong>8.76</strong></td>
<td><strong>438.00</strong></td>
<td><strong>8.76</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Methodology**

Uncontrolled Particulate (lbs/hr) = Maximum Usage (lbs/hr) * Transfer Efficiency (%)

Uncontrolled Particulate (tons/yr) = Maximum Usage (lbs/hr) * Transfer Efficiency (%) * 8760 (hrs/yr) * 1/2000 (ton/lbs)

Potential Particulate (lbs/hr) = Uncontrolled Particulate (lbs/hr) * (1 - % Control Efficiency)

Potential Particulate (tons/yr) = Uncontrolled Particulate (tons/yr) * (1 - % Control Efficiency) * 8760 (hrs/yr) * 1/2000 (ton/lbs)

### Dip Tank (SC4) and Roll Coating (SC5)

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Organics</th>
<th>Gal of Mat. (gallons/hr)</th>
<th>Gal of Mat. (gallons/yr)</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC pounds per year</th>
<th>Potential VOC tons per year</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dip Tank (SC4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>100%</td>
</tr>
<tr>
<td>YUMAX PSW-50</td>
<td>7.68</td>
<td>67.00%</td>
<td>0.11</td>
<td>1,001</td>
<td>5.14</td>
<td>14.11</td>
<td>5.150</td>
<td>2.57</td>
<td></td>
</tr>
<tr>
<td>Roll Coating (SC5)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fuchs Anticorit SL 6941</td>
<td>6.95</td>
<td>43.20%</td>
<td>1.15</td>
<td>10,038</td>
<td>3.00</td>
<td>82.58</td>
<td>20,144</td>
<td>15.07</td>
<td></td>
</tr>
</tbody>
</table>

**Methodology**

Gal. of Material (gallons/yr) = 20 (gallons/yr) * 175 (hrs/yr)

Roll Coating Gal. of Material (gallons/yr) = 55 (gallons/yr) * 48 (hrs/yr)

All water based paints. Source can paint only one color at a time in each booth

All coatings used contain no Hazardous Air Pollutants (HAPs)

### Dip Tank (SC4)

### Roll Coating (SC5)

### METHODOLOGY

Gal. of Material (gallons/yr) = Gallon of Material (gallons/yr) * 8760 (hrs/yr)

Potential VOC pounds per year = Gallon of Material (gallons/yr) * Safety Factor * Pounds VOC per gallon of coating (lbs/gal)

Potential VOC tons per year = Potential VOC pounds per year (lbs/yr) / 2000 (lb/ton)
### Appendix A: Emissions Calculations

#### Hazardous Air Pollutants (HAPs) From Surface Coating Operations

**Company Name:** McCoy Investments dba IDS Blast Finishing  
**Source Address:** 2717 Tobey Drive, Indianapolis, Indiana 46219  
**Permit Number:** F097-41235-00524  
**Reviewer:** L. David Cohen

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material</th>
<th>Maximum (gal/unit)</th>
<th>Xylene</th>
<th>Methyl Ethyl Ketone</th>
<th>Cumene</th>
<th>Ethylbenzene</th>
<th>Methyl Isobutyl Ketone</th>
<th>Hexamethylene Diisocyanate</th>
<th>Naphthalene</th>
<th>Tert-Butyl Acetate</th>
<th>Diphenyl methane Diisocyanate</th>
<th>Styrene</th>
<th>Methyl Methacrylate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acrolon 218HS 2-part polyurethane</td>
<td>11.20</td>
<td>1.50</td>
<td>0.33</td>
<td>4.06%</td>
<td>4.99%</td>
<td>0.00%</td>
<td>0.72%</td>
<td>0.00%</td>
<td>0.43%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
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<td>0.00%</td>
</tr>
<tr>
<td>Phenicon HS Epoxy - 2 parts</td>
<td>12.45</td>
<td>1.50</td>
<td>0.33</td>
<td>18.00%</td>
<td>3.00%</td>
<td>0.00%</td>
<td>3.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td></td>
</tr>
<tr>
<td>Harrison Quick Dry Enamel</td>
<td>10.55</td>
<td>1.50</td>
<td>0.33</td>
<td>20.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>5.00%</td>
<td>1.00%</td>
<td>0.00%</td>
<td>0.00%</td>
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</tr>
<tr>
<td>Sherwin Williams Recoatable Epoxy Primer</td>
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<td>0.75</td>
<td>0.33</td>
<td>20.00%</td>
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<td>0.00%</td>
<td>3.00%</td>
<td>0.00%</td>
<td>0.00%</td>
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</tr>
<tr>
<td>Sherwin Williams Recoatable Epoxy Primer Part H</td>
<td>12.69</td>
<td>0.75</td>
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<td>0.00%</td>
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</tr>
<tr>
<td>Devran 224 2 parts</td>
<td>13.70</td>
<td>1.50</td>
<td>0.33</td>
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<td>0.00%</td>
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<td>0.00%</td>
<td>0.00%</td>
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<tr>
<td>Carbothane 8845</td>
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<tr>
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<tr>
<td>PPG Grey High Solids Primer 592637</td>
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</tr>
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<td>Thanex HS Epoxy - 2 parts</td>
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<td>0.00%</td>
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<tr>
<td>Sherwin Williams High Solids Acrylic Enamel</td>
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<td>1.50</td>
<td>0.33</td>
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<td>1.50</td>
<td>0.33</td>
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<td>PPG Americoat 370 Part B</td>
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<td>0.33</td>
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<tr>
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<td>1.50</td>
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<td>0.00%</td>
<td>1.68%</td>
<td></td>
</tr>
</tbody>
</table>

*Note: The table lists the density, gallons of material, and maximum values for various materials used in surface coating operations. The emissions calculations for each material are based on the provided data and are reported as weight percentages.*
### Hazardous Air Pollutants (HAPs) From Surface Coating Operations (continued)

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**PTE of worst case coating (ton/yr):** 5.83 5.67 0.29 1.28 1.47 0.23 0.11 1.93 2.51 0.51 0.38 8.42

**METHODOLOGY:**

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

Hapcalc.xls 9/95
Appendix A: Emissions Calculations
Natural Gas Combustion Only

MM BTU/HR <100

Company Name: McCoy Investments dba IDS Blast Finishing
Source Address: 2717 Tobey Drive, Indianapolis, Indiana 46219
Permit Number: F097-41235-00524
Reviewer: L. David Cohen

Emission Calculations

**Natural Gas Combustion Only**

### Individual Heat Input Capacity

<table>
<thead>
<tr>
<th>Emission Unit Ids</th>
<th># of Emission Units</th>
<th>Individual Heat Input Capacity</th>
<th>Potential Throughput</th>
<th>Emission Units</th>
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<td>EC4</td>
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<td>EC7, EC13</td>
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### Pollutant Emission Factors

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<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
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<td>PM*</td>
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<td>0.36</td>
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<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.36</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.36</td>
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<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.03</td>
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<td>NOx</td>
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<tr>
<td>VOC</td>
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<td>0.26</td>
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**See below**

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**

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

### HAPs Calculations

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
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</thead>
<tbody>
<tr>
<td>Benzene</td>
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</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
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<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
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<tr>
<td>Hexane</td>
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<td>Toluene</td>
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<td>Total - Organics</td>
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#### HAPs - Metals

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<th>Potential Emission in tons/yr</th>
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<td>Lead</td>
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<tr>
<td>Cadmium</td>
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<tr>
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<td>Manganese</td>
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<td>Nickel</td>
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<tr>
<td>Total - Metals</td>
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</table>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.
May 22, 2019

Michael Archer
IDS BLAST FINISHING
2717 Tobey Dr
Indianapolis, IN 46219

Re: Public Notice

McCoy Investments dba IDS Blast Finishing
Permit Level: FESOP Significant Permit Rev
Permit Number: 097-41235-00524

Dear Michael Archer:

Enclosed is a copy of your draft FESOP Significant Permit Rev (Minor PSD/EO) (120), Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Indianapolis Public Library Franklin Road Branch, 5550 S. Franklin Road in Indianapolis IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to L. David Cohen, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0178 or dial (317) 233-0178.

Sincerely,

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
May 22, 2019

To: Indianapolis Public Library Franklin Road Branch 5550 S. Franklin Road
Indianapolis IN 46239 (Library)

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: McCoy Investments dba IDS Blast Finishing
Permit Number: 097-41235-00524

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

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

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

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

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

May 22, 2019
McCoy Investments dba\ IDS Blast Finishing
097-41235-00524

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

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

Enclosure
PN AAA Cover Letter 4/12/2019
### Mail Code 61-53

**Name and address of Sender**

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<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
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</thead>
</table>
| 1    |                | Michael Archer  
IDS BLAST FINISHING 2717 Tobey Dr Indianapolis IN 46219 (Source CAATS) |         |                 |                            |               |                 |          |         |         |               |         |
| 2    |                | Marion County Health Department 3838 N. Rural St Indianapolis IN 46205-2930 (Health Department) |         |                 |                            |               |                 |          |         |         |               |         |
| 3    |                | Indianapolis City Council and Mayors office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official) |         |                 |                            |               |                 |          |         |         |               |         |
| 4    |                | Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official) |         |                 |                            |               |                 |          |         |         |               |         |
| 5    |                | Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official) |         |                 |                            |               |                 |          |         |         |               |         |
| 6    |                | Indianapolis Public Library Franklin Road Branch 5550 S. Franklin Road Indianapolis IN 46239 (Library) |         |                 |                            |               |                 |          |         |         |               |         |
| 7    |                | Johan & Susan Van Den Heuvel 4409 Blue Creek Drive Carmel IN 46033 (Affected Party) |         |                 |                            |               |                 |          |         |         |               |         |
| 8    |                | Indiana Members Credit Union 5103 Madison Avenue Indianapolis IN 46227 (Affected Party) |         |                 |                            |               |                 |          |         |         |               |         |
| 9    |                | City of Indianapolis, Attn: General Council 200 East Washington Street Indianapolis IN 46204 (Affected Party) |         |                 |                            |               |                 |          |         |         |               |         |
| 10   |                |                                               |         |                 |                            |               |                 |          |         |         |               |         |
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|      |                | **Total number of Pieces Received at Post Office** |         |                 |                            |               |                 |          |         |         |               |         |
|      |                | **Postmaster, Per (Name of Receiving employee)** |         |                 |                            |               |                 |          |         |         |               |         |
|      |                | **The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable on registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.** |         |                 |                            |               |                 |          |         |         |               |         |