



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

To: Interested Parties

Date: July 3, 2024

From: Jenny Acker, Chief
Permits Branch
Office of Air Quality

Source Name: US Premier Tube Mills

Permit Level: MSOP New Source Construction (Minor PSD/EO)

Permit Number: 077-46805-00035

Source Location: 2855 and 2971 Michigan Rd Madison, IN 47250

Type of Action Taken: Initial Permit

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, choose Search Option **by Permit Number**, then enter permit 46805. This search will also provide the application received date, **draft permit** public notice start and end date, and **final** permit issuance date.

The final decision is also available via IDEM's Virtual File Cabinet (VFC). Please go to: <https://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.

(continues on next page)

If you would like to request a paper copy of the permit document, please contact IDEM's Office of Records Management:

IDEM - Office of Records Management
Indiana Government Center North, Room 1207
100 North Senate Avenue
Indianapolis, IN 46204
Phone: (317) 232-8667
Fax: (317) 233-6647
Email: IDEMFILEROOM@idem.in.gov

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Indiana Office of Administrative Law Proceedings, 100 N. Senate Avenue Suite N802, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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



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Governor

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Commissioner

**New Source Construction and
Minor Source Operating Permit
OFFICE OF AIR QUALITY**

**US Premier Tube Mills
2855 and 2971 Michigan Rd
Madison, Indiana 47250**

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

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

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

Operation Permit No.: M077-46805-00035

Master Agency Interest ID: 10622

Issued by:

Madhima Des for
Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Issuance Date: July 3, 2024

Expiration Date: July 3, 2029



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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary source that manufactures steel pipes and tubes.

Source Address:	2855 Michigan Rd, Madison, Indiana 47250 2971 Michigan Rd, Madison, Indiana 47250
General Source Phone Number:	(281) 4467070
SIC Code:	3317 (Steel Pipes and Tubes)
County Location:	Jefferson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition

This source consists of two (2) buildings located at the following addresses:

- (a) North Building is located at 2971 Michigan Road, Madison, IN 47250.
- (b) South Building is located at 2855 Michigan Road, Madison, IN 47250.

These buildings are located on contiguous or adjacent properties, have the same SIC codes and are under common control, therefore they are considered one (1) source, as defined by 326 IAC 2-7-1(22).

This determination was initially made under a New Source Construction and Minor Source Operating Permit (MSOP) No. 077-46805-00035.

A.3 Emission Units and Pollution Control Equipment Summary

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

- (1) Emission units located in the North Building located at 2971 Michigan Road, Madison, IN 47250:
 - (a) One (1) manual powder coating line, identified as NPC1, approved in 2024 for construction, with a maximum capacity of 54.77 pounds of powder per hour, coating metal, using an integral primary cartridge filter as powder recovery device, and the secondary filter as a particulate control, and exhausting indoors.
 - (b) One (1) natural gas fired dry off oven, identified as NDO1, approved in 2024 for construction, with a maximum capacity of 4 million British thermal units per hour, using no control and exhausting through stack NDOS1.
 - (c) One (1) natural gas fired curing oven, identified as NCO1, approved in 2024 for construction, with a maximum capacity of 4 million British thermal units per hour, using no control and exhausting through stack NCOS1.

- (d) One (1) natural gas fired boiler, identified as NB1, approved in 2024 for construction, with a maximum capacity of 3.5 million British thermal units per hour, using no control and exhausting through stack NBS1.
 - (e) One (1) 4-stage clean/prep line for powder coating, identified as NPCWL1, approved in 2024 for construction, with a maximum capacity of 0.1 of gallon of solvent per hour, using no control, and exhausting indoors.
 - (f) Fifteen (15) coil slitters, identified as NCS1 through NCS15, constructed in 2017, each with a maximum cutting rate of 4200 inches per minute, using no control and exhausting indoors.
 - (g) One (1) coil slitter rust prevention coating application line, identified as NCSCA1, constructed in 2017, utilizing misting system application, with a maximum capacity of 8.65 gallons of a rust prevention liquid per day, using no control and exhausting indoors.
 - (h) One (1) TIG sheet butt welder, identified as NBW1, constructed in 2019, with a maximum electrode consumption rate of 0.1 pounds per hour, using no control, and exhausting indoor.

This welder is affected sources under NESHAP 40 CFR 63, Subpart XXXXXX.
 - (i) One (1) high-frequency tube welder, identified as NHFW1 with no emissions, constructed in 2012.
 - (j) One (1) outer diameter scarfing tool, identified as NOS1, constructed in 2019, with a maximum capacity of 0.3 tons per hour, using no control, and exhausting indoors.
 - (k) One (1) re-metalizing line, identified as NRM1, constructed in 2019, with a maximum capacity of 2.5 pounds per hour, using no control, and exhausting indoors.
 - (l) One (1) tube mill cooling line, identified as NCL1, constructed in 2019, with a maximum capacity of 1,584 gallons per year, using no control, and exhausting indoors.
 - (m) One (1) tube mills wash line cleaner, identified as NWL1, constructed in 2019, with a maximum capacity of 2,640 gallons of solvent per year, using no control, and exhausting indoors.
 - (n) One (1) clear coat vacuum coater line, identified as NVC1, constructed in 2019, with a maximum capacity of 31.68 gallons of coating per day, using no control, and exhausting indoors.
 - (o) One (1) cutoff saw, identified as NCOS1, constructed in 2019, with a maximum cutting rate of 3000 inches per minute, using no control and exhausting indoors.
 - (p) One (1) cooling tower, identified as NCT1, constructed in 2010, with a maximum recirculation rate of 405 gallons per minute, using no control and exhausting outdoors.
- (2) Emission units located in the South Building located at 2855 Michigan Road, Madison, IN 47250:
- (a) One (1) manual powder coating line, identified as SPC1, constructed in 2010, with a maximum capacity of 54.77 pounds of powder per hour, coating metal, using an integral primary cartridge filter as powder recovery device, and the secondary filter as a particulate control, and exhausting indoors.
 - (b) Four (4) natural gas combustion units, using no control, consisting of the following:

Emission Unit	Unit ID	Maximum Throughput (MMBtu/hr)	Year Constructed
Wash Line Stage 1 Heater	SWLH1	2.0	2010
Dry off Oven	SDO1	1.5	2010
Powder Coat Curing Oven	SCO1	2.5	2010
Powder Coat Curing Oven	SCO2	1.6	2010

- (c) Four (4) TIG sheet butt welders, identified as SBW1 through SBW4, constructed in 2012, each with a maximum electrode consumption rate of 0.1 pounds per hour, using no control, and exhausting indoors.

 These welders are affected sources under NESHAP 40 CFR 63, Subpart XXXXXX.
 - (d) Four (4) high-frequency tube welders, identified as SHFW1 through SHFW4 with no emissions, constructed in 2012.
 - (e) Four (4) outer diameter scarfing tools, identified as SOS1 through SOS4, constructed in 2012, each with a maximum capacity of 0.3 tons per hour, using no control, and exhausting indoors.
 - (f) Four (4) re-metalizing lines, identified as SRM1 through SRM4, constructed in 2019, each with a maximum capacity of 2.5 pounds per hour, using no control, and exhausting indoors.
 - (g) Four (4) tube mill cooling lines, identified as SCL1 through SCL4, constructed in 2019, each with a maximum capacity of 1,584 gallons per year, using no control, and exhausting indoors.
 - (h) Four (4) tube mills washing, identified as SWL1 through SWL4, constructed in 2019, each with a maximum capacity of 2,640 gallons of solvent per year, using no control, and exhausting indoors.
 - (i) Four (4) clear coat vacuum coater lines, identified as SVC1 through SVC4, constructed in 2019, each with a maximum capacity of 31.68 gallons of coating per day, using no control, and exhausting indoors.
 - (j) Four (4) cutoff saws, identified as SCOS1 through SCOS4, constructed in 2019, each with a maximum cutting rate of 3000 inches per minute, using no control and exhausting indoors.
 - (k) Two (2) cooling towers, identified as SCT1 through SCT2, constructed in 2010, each with a maximum recirculation rate of 405 gallons per minute, using no control and exhausting outdoors.
 - (l) One (1) 5-stage clean/prep cleaner for powder coating, identified as SPCWL1, constructed in 2010, with a maximum capacity of 0.01 gallon of solvent per hour, using no control and exhausting indoors.
- (3) North and Buildings:
- (a) Paved Roads

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction described in the application, the source may not continue operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M077-46805-00035, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date 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.5 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.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

The Permittee shall implement the PMPs.

- (b) 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.
- (c) 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 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M077-46805-00035 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.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.14 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing an administrative amendment. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

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

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.20 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

C.7 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(c).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

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

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

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

- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

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

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

C.14 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.
- (c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

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

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- 1- Emission units included in the North Building located at 2971 Michigan Road, Madison, IN 47250:
- ...
- (a) One (1) manual powder coating line, identified as NPC1, approved in 2024 for construction, with a maximum capacity of 54.77 pounds of powder per hour, coating metal, using an integral primary cartridge filter as powder recovery device, and the secondary filter as a particulate control, and exhausting indoors.
- 2- Emission units included in the South Building located at 2855 Michigan Road, Madison, IN 47250:
- ...
- (a) One (1) manual powder coating line, identified as SPC1, constructed in 2010, with a maximum capacity of 54.77 pounds of powder per hour, coating metal, using an integral primary cartridge filter as powder recovery device, and the secondary filter as a particulate 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 2-6.1-5(a)(1)]

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

- (a) NPC1
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) manual powder coating line, identified as NPC1, shall not exceed 0.551 pounds per hour.
- (b) SPC1
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) manual powder coating line, identified as SPC1, shall not exceed 0.36 pounds per hour when operating at a process weight rate of 0.027 tons per hour.

The pounds per hour limitations were calculated with the following equation:

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

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

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

A Preventive Maintenance Plan is required for 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 2-6.1-5(a)(2)]

D.1.3 Particulate Control

- (a) In order to assure compliance with 326 IAC 2-6.1 (Minor Source Operating Program), the integral primary cartridge filters shall be in operation when the two (2) powder coating lines NPC1 and SPC1 are in operation.

- (b) In order to assure compliance with Condition D.1.1(b), the secondary filter for particulate control shall be in operation and control emissions from the one (1) manual powder coating line, identified as SPC1, at all times that the powder coating spray line is in operation.

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

D.1.4 Monitoring

- (a) The Permittee shall operate the dry particulate filter system in accordance with the manufacturer's specifications.

- (b) Daily inspections shall be performed of the secondary dry particulate filter from the one (1) manual powder coating line, identified as SPC1 to verify the placement, integrity and particle loading of the filters. If a condition exists which should result in a response step, 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 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain a log of the daily inspections. The Permittee shall include in its daily record when a daily inspection is conducted and the reason for the lack of a daily inspection (e.g., the process did not operate that day).

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (1) Emission units located in the North Building plant located at 2971 Michigan Road, Madison, IN 47250:
- ...
- (g) One (1) coil slitter rust prevention coating application line, identified as NCSCA1, constructed in 2017, utilizing misting system application, with a maximum capacity of 8.65 gallons of a rust prevention liquid per day, using no control and exhausting indoors.
- ...
- (n) One (1) clear coat vacuum coater line, identified as NVC1, constructed in 2019, with a maximum capacity of 31.68 gallons of coating per day, coating metal, using no control, and exhausting indoors.
- (2) Emission units located in the South Building plant located at 2855 Michigan Road, Madison, IN 47250:
- ...
- (i) Four (4) clear coat vacuum coater lines, identified as SVC1 through SVC4, constructed in 2019, each with a maximum capacity of 31.68 gallons of coating per day, coating metal, using no 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 2-6.1-5(a)(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

- (a) Pursuant to 326 IAC 8-2-9(c)(2) (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to each of the following shall be limited to 3.5 pounds of VOC per gallon of coating excluding water, for forced warm air dried coatings, up to 194 degrees Fahrenheit:
- (1) One (1) coil slitter rust prevention coating application line, identified as NCSCA1.
 - (2) One (1) clear coat vacuum coater line, identified as NVC1.
 - (3) Four (4) clear coat vacuum coater lines, identified as SVC1 through SVC4.
- (b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:
- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.2.3 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.2.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1(a), 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 usage limits established in Condition D.2.1(a).
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of each coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and safety data sheets (SDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (1) Emission units located in the North Building located at 2971 Michigan Road, Madison, IN 47250:
...
- (m) One (1) tube mills wash cleaner, identified as NWL1, constructed in 2019, with a maximum capacity of 0.34 gallons of solvent per hour, using no control, and exhausting indoors.
- (2) Emission units located in the South Building located at 2855 Michigan Road, Madison, IN 47250:
...
- (h) Four (4) tube mills wash line cleaners, identified as SWL1 through SWL4, constructed in 2019, each with a maximum capacity of 0.34 gallons of solvent per hour, using no 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 2-6.1-5(a)(1)]

D.3.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

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

- (a) Ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvents only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

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

D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.3.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent purchased (or invoice/bill dates of contract servicer indicating service date).
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (1) Emission units located in the North Building located at 2971 Michigan Road, Madison, IN 47250:
...
(d) One (1) natural gas fired boiler, identified as NB1, approved for construction in 2024, with a maximum capacity of 3.5 million British thermal units per hour, using no control and exhausting through stack NBS1.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.4.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating, emission limitations for facilities specified in 326 IAC 6-2-1(d)), the particulate emissions from boiler (NB1) shall not exceed 0.60 pounds per million British thermal units heat input (lb/MMBtu).

This limitation was calculated using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input.

= 3.50 million British thermal units per hour.

D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

SECTION E.1

NESHAP

Emissions Unit Description:

(1) Emission units located in the North Building located at 2971 Michigan Road, Madison, IN 47250:

...

(g) One (1) TIG sheet butt welder, identified as NBW1, constructed in 2019, with a maximum electrode consumption rate of 0.1 pounds per hour, using no control, and exhausting indoors.

This welder is affected sources under NESHAP 40 CFR 63, Subpart XXXXXX.

(2) Emission units located in the South Building plant located at 2855 Michigan Road, Madison, IN 47250:

(c) Four (4) TIG sheet butt welders, identified as SBW1 through SBW4, constructed in 2012, each with a maximum electrode consumption rate of 0.1 pounds per hour, using no control, and exhausting indoors.

These welders are affected sources under NESHAP 40 CFR 63, Subpart XXXXXX.

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-6.1-5(a)(1)]**

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

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

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

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

E.1.2 Nine Metal Fabrication and Finishing Sources NESHAP [40 CFR Part 63, Subpart XXXXXX]

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

- (1) 40 CFR 63. 11514(a),(2),(b),(5)(c)(i)
- (2) 40 CFR 63. 11515(a)
- (3) 40 CFR 63. 11516(b)(1)&(2) , (f)(1)(2 i, ii, iii, iv, v)
- (4) 40 CFR 63. 11519(a I, ii, iii, iv),(2 i, ii),(2 i, ii, iii), (c)(1 through 4), (c)(11 through 15)
- (5) 40 CFR 63. 11521
- (6) 40 CFR 63. 11522
- (7) 40 CFR 63. 11523
- (8) Table 1
- (9) Table2

E.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	US Premier Tube Mills
Source Address:	2855 Michigan Rd
Source Address:	2971 Michigan Rd
City:	Madison, Indiana 47250
Phone #:	(281) 4467070
MSOP #:	M077-46805-00035

I hereby certify that US Premier Tube Mills is:

still in operation.

no longer in operation.

I hereby certify that US Premier Tube Mills is:

in compliance with the requirements of MSOP M077-46805-00035.

not in compliance with the requirements of MSOP M077-46805-00035.

Authorized Individual (typed):	
Title:	
Signature:	Date:
Email Address:	Phone:

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

Noncompliance:

MALFUNCTION REPORT

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

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6.

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6.

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

US Premier Tube Mills
2855 and 2971 Michigan Rd
Madison, Indiana 47250

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that US Premier Tube Mills, 2855 and 2971 Michigan Rd, Madison, Indiana 47250, has constructed and will operate a stationary source that manufactures steel pipes and tubes. on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on **July 10 2023** and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M077-46805-00035, Plant ID No. 077-00035 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

Attachment A

Minor Source Operating Permit (MSOP) No: 077-46805-00035

Electronic Code of Federal Regulations

Title 40: Protection of Environment +

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

Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

SOURCE: 73 FR 43000, July 23, 2008, unless otherwise noted.

Applicability and Compliance Dates

APPLICABILITY AND COMPLIANCE DATES

§63.11514 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of this section. Descriptions of these source categories are shown in Table 1 of this subpart. "Primarily engaged" is defined in §63.11522, "What definitions apply to this subpart?"

- (1) Electrical and Electronic Equipment Finishing Operations;
- (2) Fabricated Metal Products;
- (3) Fabricated Plate Work (Boiler Shops);
- (4) Fabricated Structural Metal Manufacturing;
- (5) Heating Equipment, except Electric;
- (6) Industrial Machinery and Equipment Finishing Operations;
- (7) Iron and Steel Forging;
- (8) Primary Metal Products Manufacturing; and
- (9) Valves and Pipe Fittings.

(b) The provisions of this subpart apply to each new and existing affected source listed and defined in paragraphs (b)(1) through (5) of this section if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.

(1) A dry abrasive blasting affected source is the collection of all equipment and activities necessary to perform dry abrasive blasting operations which use materials that contain MFHAP or that have the potential to emit MFHAP.

(2) A machining affected source is the collection of all equipment and activities necessary to perform machining operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or that have the potential to emit MFHAP.

(3) A dry grinding and dry polishing with machines affected source is the collection of all equipment and activities necessary to perform dry grinding and dry polishing with machines operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.

(4) A spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints which contain MFHAP. A spray painting affected source includes all equipment used to apply cleaning materials to a substrate to prepare it for paint application (surface preparation) or to remove dried paint; to apply a paint to a substrate (paint application) and to dry or cure the paint after application; or to clean paint operation equipment (equipment cleaning). Affected source(s) subject to the requirements of this paragraph are not subject to the miscellaneous surface coating provisions of subpart HHHHHH of this part, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources."

(5) A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.

(c) An affected source is existing if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, before April 3, 2008.

(d) An affected source is new if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, on or after April 3, 2008.

(e) This subpart does not apply to research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air Act (CAA).

(f) This subpart does not apply to tool or equipment repair operations, facility maintenance, or quality control activities as defined in §63.11522, "What definitions apply to this subpart?"

(g) This subpart does not apply to operations performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(h) This subpart does not apply to operations that produce military munitions, as defined in §63.11522, "What definitions apply to this subpart?", manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), or equipment directly and exclusively used for the purposes of transporting military munitions.

(i) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

§63.11515 What are my compliance dates?

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions in this subpart by July 25, 2011.

(b) If you own or operate a new affected source, you must achieve compliance with the applicable provisions in this subpart by July 23, 2008, or upon startup of your affected source, whichever is later.

STANDARDS AND COMPLIANCE REQUIREMENTS

§63.11516 What are my standards and management practices?

(a) *Dry abrasive blasting standards.* If you own or operate a new or existing dry abrasive blasting affected source, you must comply with the requirements in paragraphs (a)(1) through (3) of this section, as applicable, for each dry abrasive blasting operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when abrasive blasting operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

(1) *Standards for dry abrasive blasting of objects performed in totally enclosed and unvented blast chambers.* If you own or operate a new or existing dry abrasive blasting affected source which consists of an abrasive blasting chamber that is totally enclosed and unvented, as defined in §63.11522, "What definitions apply to this subpart?", you must implement management practices to minimize emissions of MFHAP. These management practices are the practices specified in paragraph (a)(1)(i) and (ii) of this section.

(i) You must minimize dust generation during emptying of abrasive blasting enclosures; and

(ii) You must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

(2) *Standards for dry abrasive blasting of objects performed in vented enclosures.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which has a vent allowing any air or blast material to escape, you must comply with the requirements in paragraphs (a)(2)(i) and (ii) of this section. Dry abrasive blasting operations for which the items to be blasted exceed 8 feet (2.4 meters) in any dimension, may be performed subject to the requirements in paragraph (a)(3) of this section.

(i) You must capture emissions and vent them to a filtration control device. You must operate the filtration control device according to manufacturer's instructions, and you must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in §63.11519(c)(4), "What are my notification, recordkeeping, and reporting requirements?"

(ii) You must implement the management practices to minimize emissions of MFHAP as specified in paragraphs (a)(2)(ii)(A) through (C) of this section.

(A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(B) You must enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and

(C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

(3) *Standards for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which is performed on objects greater than 8 feet (2.4 meters) in any one dimension, you may implement management practices to minimize emissions of MFHAP as specified in paragraph (a)(3)(i) of this section instead of the practices required by paragraph (a)(2) of this section. You must demonstrate that management practices are being implemented by complying with the requirements in paragraphs (a)(3)(ii) through (iv) of this section.

(i) Management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are specified in paragraphs (a)(3)(i)(A) through (E) of this section.

(A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(B) You must enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material; and

(C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions; and

(D) You must not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and

(E) Whenever practicable, you must switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide), where PM is a surrogate for MFHAP.

(ii) You must perform visual determinations of fugitive emissions, as specified in §63.11517(b), "What are my monitoring requirements?", according to paragraphs (a)(3)(ii)(A) or (B) of this section, as applicable.

(A) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, you must perform visual determinations of fugitive emissions at the fenceline or property border nearest to the outdoor dry abrasive blasting operation.

(B) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, you must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.

(iii) You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), "What are my notification, recordkeeping, and reporting requirements?"

(iv) If visible fugitive emissions are detected, you must perform corrective actions until the visible fugitive emissions are eliminated, at which time you must comply with the requirements in paragraphs (a)(3)(iv)(A) and (B) of this section.

(A) You must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements."

(B) You must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

(b) *Standards for machining.* If you own or operate a new or existing machining affected source, you must implement management practices to minimize emissions of MFHAP as specified in paragraph (b)(1) and (2) of this section for each machining operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

(1) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(2) You must operate all equipment associated with machining according to manufacturer's instructions.

(c) *Standards for dry grinding and dry polishing with machines.* If you own or operate a new or existing dry grinding and dry polishing with machines affected source, you must comply with the requirements of paragraphs (c)(1) and (2) of this section for each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit

MFHAP. These requirements do not apply when dry grinding and dry polishing operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

(1) You must capture emissions and vent them to a filtration control device. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in §63.11519(c)(4), "Notification, recordkeeping, and reporting Requirements."

(2) You must implement management practices to minimize emissions of MFHAP as specified in paragraphs (c)(2)(i) and (ii) of this section.

(i) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;

(ii) You must operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.

(d) *Standards for control of MFHAP in spray painting.* If you own or operate a new or existing spray painting affected source, as defined in §63.11514 (b)(4), "Am I subject to this subpart?," you must implement the management practices in paragraphs (d)(1) through (9) of this section when a spray-applied paint that contains MFHAP is being applied. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied.

(1) *Standards for spray painting for MFHAP control.* All spray-applied painting of objects must meet the requirements of paragraphs (d)(1)(i) through (iii) of this section. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities, as described in Table 1, "Description of Source Categories Affected by this Subpart," or affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.

(i) Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.

(ii) All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.

(iii) You must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in §63.11519(c)(5), "Notification, recordkeeping, and reporting requirements."

(iv) As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (d)(1)(i) through (iii) of this section.

(2) *Standards for spray painting application equipment of all objects painted for MFHAP control.* All paints applied via spray-applied painting must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air

Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002", Revision 0 (incorporated by reference, see §63.14).

(3) *Spray system recordkeeping.* You must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in §63.11519(c)(7), "Notification, recordkeeping, and reporting requirements."

(4) *Spray gun cleaning.* All cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used.

(5) *Spray painting worker certification.* All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (d)(6) of this section. The spray application of paint is prohibited by persons who are not certified as having completed the training described in paragraph (d)(6) of this section. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations.

(6) *Spray painting training program content.* Each owner or operator of an affected spray painting affected source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by paragraph (d)(5) of this section. The training program must include, at a minimum, the items listed in paragraphs (d)(6)(i) through (iii) of this section.

(i) A list of all current personnel by name and job description who are required to be trained;

(ii) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (d)(6)(ii)(A) through (D) of this section.

(A) Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(B) Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(C) Routine spray booth and filter maintenance, including filter selection and installation.

(D) Environmental compliance with the requirements of this subpart.

(iii) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (d)(6)(ii) of this section are not required to provide the initial training required by that paragraph to these painters.

(7) *Records of spray painting training.* You must maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in §63.11519(c)(8), "Notification, recordkeeping, and reporting requirements."

(8) *Spray painting training dates.* As required by paragraph (d)(5) of this section, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the dates specified in paragraphs (d)(8)(i) and (ii) of this section.

(i) If your source is a new source, all personnel must be trained and certified no later than January 20, 2009, 180 days after startup, or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

(ii) If your source is an existing source, all personnel must be trained and certified no later than July 25, 2011, or 180 days after hiring, whichever is later. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

(9) *Duration of training validity.* Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years.

(e) [Reserved]

(f) *Standards for welding.* If you own or operate a new or existing welding affected source, you must comply with the requirements in paragraphs (f)(1) and (2) of this section for each welding operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. If your welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), you must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs (f)(3) through (8) of this section. The requirements in paragraphs (f)(1) through (8) of this section do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

(1) You must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in §63.11519(c)(4), "Notification, recordkeeping, and reporting requirements."

(2) You must implement one or more of the management practices specified in paragraphs (f)(2)(i) through (v) of this section to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.

(i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));

(ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;

(iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;

(iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and

(v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

(3) *Tier 1 compliance requirements for welding.* You must perform visual determinations of welding fugitive emissions as specified in §63.11517(b), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations. You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), "Notification, recordkeeping, and reporting requirements."

(4) *Requirements upon initial detection of visible emissions from welding.* If visible fugitive emissions are detected during any visual determination required in paragraph (f)(3) of this section, you must comply with the requirements in paragraphs (f)(4)(i) and (ii) of this section.

(i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section. After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.

(ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

(5) *Tier 2 requirements upon subsequent detection of visible emissions.* If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), you must comply with paragraphs (f)(5)(i) through (iv) of this section.

(i) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, you must conduct a visual determination of emissions opacity, as specified in §63.11517(c), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.

(ii) In lieu of the requirement of paragraph (f)(3) of this section to perform visual determinations of fugitive emissions with EPA Method 22, you must perform visual determinations of emissions opacity in accordance with §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(iii) You must keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, in accordance with the requirements in §63.11519(c)(3), "Notification, recordkeeping, and reporting requirements."

(iv) You must report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by §63.11519(b)(6), "Notification, recordkeeping, and reporting requirements."

(6) *Requirements for opacities less than or equal to 20 percent but greater than zero.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, you must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section.

(7) *Tier 3 requirements for opacities exceeding 20 percent.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded exceeds 20 percent, you must comply with the requirements in paragraphs (f)(7)(i) through (v) of this section.

(i) You must submit a report of exceedence of 20 percent opacity, along with your annual certification and compliance report, as specified in §63.11519(b)(8), "Notification, recordkeeping, and reporting requirements," and according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(ii) Within 30 days of the opacity exceedence, you must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (f)(8) of this section. If you have already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, you must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.

(iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, you must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(iv) You must maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (f)(7)(iii) of this section, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in §63.11519(b)(9), "Notification, recordkeeping, and reporting requirements."

(v) You must include these records in your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(8) *Site-Specific Welding Emissions Management Plan*. The Site-Specific Welding Emissions Management Plan must comply with the requirements in paragraphs (f)(8)(i) through (iii) of this section.

(i) Site-Specific Welding Emissions Management Plan must contain the information in paragraphs (f)(8)(i)(A) through (F) of this section.

(A) Company name and address;

(B) A list and description of all welding operations which currently comprise the welding affected source;

(C) A description of all management practices and/or fume control methods in place at the time of the opacity exceedence;

(D) A list and description of all management practices and/or fume control methods currently employed for the welding affected source;

(E) A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (f)(7)(ii) of this section, and the projected date of implementation; and

(F) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to paragraphs (f)(8)(i)(D) and (E) of this section.

(ii) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by paragraphs (f)(8)(i)(A) through (C) of this section, and submitted with your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(iii) You must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records in a readily-accessible location for inspector review, in accordance with the requirements in §63.11519(c)(12), "Notification, recordkeeping, and reporting requirements."

§63.11517 What are my monitoring requirements?

(a) *Visual determination of fugitive emissions, general*. Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. You must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.

(b) *Visual determination of fugitive emissions, graduated schedule*. Visual determinations of fugitive emissions must be performed in accordance with paragraph (a) of this section and according to the schedule in paragraphs (b)(1) through (4) of this section.

(1) *Daily Method 22 Testing*. Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.

(2) *Weekly Method 22 Testing*. If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (b)(1) of this section for 10 days of work day operation of the process, you may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one

calendar week). If visible fugitive emissions are detected during these tests, you must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (b)(1) of this section.

(3) *Monthly Method 22 Testing.* If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b)(2) of this section, you may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, you must resume weekly EPA Method 22 in accordance with paragraph (b)(2) of this section.

(4) *Quarterly Method 22 Testing.* If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (b)(3) of this section, you may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, you must resume monthly EPA Method 22 in accordance with paragraph (b)(3) of this section.

(c) *Visual determination of emissions opacity for welding Tier 2 or 3, general.* Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.

(d) *Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule.* You must perform visual determination of emissions opacity in accordance with paragraph (c) of this section and according to the schedule in paragraphs (d)(1) through (5) of this section.

(1) *Daily Method 9 testing for welding, Tier 2 or 3.* Perform visual determination of emissions opacity once per day during each day that the process is in operation.

(2) *Weekly Method 9 testing for welding, Tier 2 or 3.* If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (d)(1) of this section does not exceed 20 percent for 10 days of operation of the process, you may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, you must resume testing every day of operation of the process according to the requirements of paragraph (d)(1) of this section.

(3) *Monthly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(2) of this section does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, you must resume testing every five days of operation of the process according to the requirements of paragraph (d)(2) of this section.

(4) *Quarterly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent for three consecutive monthly tests, you may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, you must resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (d)(3) of this section.

(5) *Return to Method 22 testing for welding, Tier 2 or 3.* If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent, you may resume EPA Method 22 testing as in paragraphs (b)(3) and (4) of this section. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with paragraphs (d)(3) and (4) of this section.

§63.11518 [Reserved]

§63.11519 What are my notification, recordkeeping, and reporting requirements?

(a) *What notifications must I submit?—(1) Initial notification.* If you are the owner or operator of an area source in one of the nine metal fabrication and finishing source categories, as defined in §63.11514, you must submit the initial notification required by §63.9(b), for a new affected source no later than 120 days after initial startup, or no later than 120 days after the source becomes subject to this subpart, or November 20, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than July 25, 2011, or 120 days after the source becomes subject to this subpart, whichever is later. Your initial notification must provide the information specified in paragraphs (a)(1)(i) through (iv) of this section.

(i) The name, address, phone number and e-mail address of the owner and operator;

(ii) The address (physical location) of the affected source;

(iii) An identification of the relevant standard (i.e., this subpart); and

(iv) A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.

(2) *Notification of compliance status.* If you are the owner or operator of an existing affected source, you must submit a notification of compliance status on or before November 22, 2011. If you are the owner or operator of a new affected source, you must submit a notification of compliance status within 120 days after initial startup, or by November 20, 2008, whichever is later. You are required to submit the information specified in paragraphs (a)(2)(i) through (iv) of this section with your notification of compliance status:

(i) Your company's name and address;

(ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;

(iii) If you operate any spray painting affected sources, the information required by §63.11516(e)(3)(vi)(C), "Compliance demonstration," or §63.11516(e)(4)(ix)(C), "Compliance demonstration," as applicable; and

(iv) The date of the notification of compliance status.

(b) *What reports must I prepare or submit?—(1) Annual certification and compliance reports.* You must prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (b)(2) through (7) of this section. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in paragraph (b)(3) of this section.

(2) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), "General Provisions," you must prepare and submit each annual certification and compliance report according to the dates specified in paragraphs (b)(2)(i) through (iii) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.

(ii) Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.

(iii) Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.

(3) *Alternate dates.* For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, "Title V."

(i) If the permitting authority has established dates for submitting annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," you may prepare or submit, if required, the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (b)(2)(iii) of this section.

(ii) If an affected source prepares or submits an annual certification and compliance report pursuant to this section along with, or as part of, the monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," and the compliance report includes all required information concerning exceedances of any limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same exceedances in the annual monitoring report. However, submission of an annual certification and compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(4) *General requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(4)(i) through (iii) of this section, and the information specified in paragraphs (b)(5) through (7) of this section that is applicable to each affected source.

(i) Company name and address;

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(5) *Visual determination of fugitive emissions requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(5)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."

(i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;

(ii) A description of the corrective actions taken subsequent to the test; and

(iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

(6) *Visual determination of emissions opacity requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(6)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."

(i) The date of every visual determination of emissions opacity;

(ii) The average of the six-minute opacities measured by the test; and

(iii) A description of any corrective action taken subsequent to the test.

(7) [Reserved]

(8) *Exceedences of 20 percent opacity for welding affected sources.* As required by §63.11516(f)(7)(i), "Requirements for opacities exceeding 20 percent," you must prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with your annual certification and compliance report according to the requirements in paragraph (b)(1) of this section, and must contain the information in paragraphs (b)(8)(iii)(A) and (B) of this section.

(A) The date on which the exceedence occurred; and

(B) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.

(9) *Site-specific Welding Emissions Management Plan reporting.* You must submit a copy of the records of daily visual determinations of emissions recorded in accordance with §63.11516(f)(7)(iv), "Tier 3 requirements for opacities exceeding 20 percent," and a copy of your Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to §63.11516(f)(8), "Site-specific Welding Emission Management Plan," along with your annual certification and compliance report, according to the requirements in paragraph (b)(1) of this section.

(c) *What records must I keep?* You must collect and keep records of the data and information specified in paragraphs (c)(1) through (13) of this section, according to the requirements in paragraph (c)(14) of this section.

(1) *General compliance and applicability records.* Maintain information specified in paragraphs (c)(1)(i) through (ii) of this section for each affected source.

(i) Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.

(ii) Records of the applicability determinations as in §63.11514(b)(1) through (5), "Am I subject to this subpart," listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.

(2) *Visual determination of fugitive emissions records.* Maintain a record of the information specified in paragraphs (c)(2)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."

(i) The date and results of every visual determination of fugitive emissions;

(ii) A description of any corrective action taken subsequent to the test; and

(iii) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.

(3) *Visual determination of emissions opacity records.* Maintain a record of the information specified in paragraphs (c)(3)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."

(i) The date of every visual determination of emissions opacity; and

(ii) The average of the six-minute opacities measured by the test; and

(iii) A description of any corrective action taken subsequent to the test.

(4) Maintain a record of the manufacturer's specifications for the control devices used to comply with §63.11516, "What are my standards and management practices?"

(5) *Spray paint booth filter records.* Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with §63.11516(d)(1)(ii) and (iii), "Requirements for spray painting objects in spray booths or spray rooms."

(6) *Waterspray booth or water curtain efficiency tests.* Maintain a record of the water curtain efficiency demonstrations performed in accordance with §63.11516(d)(1)(ii), "Requirements for spray painting objects in spray booths or spray rooms."

(7) *HVLP or other high transfer efficiency spray delivery system documentation records.* Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems, in compliance with §63.11516(d)(3), "Requirements for spray painting of all objects." This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If you have obtained written approval for an alternative spray application system in accordance with §63.11516(d)(2), "Spray painting of all objects," you must maintain a record of that approval along with documentation of the demonstration of equivalency.

(8) *HVLP or other high transfer efficiency spray delivery system employee training documentation records.* Maintain certification that each worker performing spray painting operations has completed the training specified in §63.11516(d)(6), "Requirements for spray painting of all objects," with the date the initial training and the most recent refresher training was completed.

(9)-(10) [Reserved]

(11) *Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan.* You must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with §63.11516(f)(7)(iii), "Requirements for opacities exceeding 20 percent."

(12) *Site-Specific Welding Emissions Management Plan.* If you have been required to prepare a plan in accordance with §63.11516(f)(7)(iii), "Site-Specific Welding Emissions Management Plan," you must maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.

(13) *Manufacturer's instructions.* If you comply with this subpart by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review.

(14) *Welding Rod usage.* If you operate a new or existing welding affected source which is not required to comply with the requirements of §63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), you must maintain records demonstrating your welding rod usage on a rolling 12-month basis.

(15) Your records must be maintained according to the requirements in paragraphs (c)(14)(i) through (iii) of this section.

(i) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1), "General Provisions." Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(ii) As specified in §63.10(b)(1), "General Provisions," you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.

(iii) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1), "General Provisions." You may keep the records off-site for the remaining 3 years.

§63.11520 [Reserved]

OTHER REQUIREMENTS AND INFORMATION

§63.11521 Who implements and enforces this subpart?

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

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

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

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

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

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

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

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

§63.11522 What definitions apply to this subpart?

The terms used in this subpart are defined in the CAA; and in this section as follows:

Adequate emission capture methods are hoods, enclosures, or any other duct intake devices with ductwork, dampers, manifolds, plenums, or fans designed to draw greater than 85 percent of the airborne dust generated from the process into the control device.

Capture system means the collection of components used to capture gases and fumes released from one or more emissions points and then convey the captured gas stream to a control device or to the atmosphere. A capture system may include, but is not limited to, the following components as applicable to a given capture system design: duct intake devices, hoods, enclosures, ductwork, dampers, manifolds, plenums, and fans.

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

Confined abrasive blasting enclosure means an enclosure that includes a roof and at least two complete walls, with side curtains and ventilation as needed to insure that no air or PM exits the enclosure while dry abrasive blasting is performed. Apertures or slots may be present in the roof or walls to allow for mechanized transport of the blasted objects with overhead cranes, or cable and cord entry into the dry abrasive blasting chamber.

Control device means equipment installed on a process vent or exhaust system that reduces the quantity of a pollutant that is emitted to the air.

Dry abrasive blasting means cleaning, polishing, conditioning, removing or preparing a surface by propelling a stream of abrasive material with compressed air against the surface. Hydroblasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions are not dry abrasive blasting.

Dry grinding and dry polishing with machines means grinding or polishing without the use of lubricating oils or fluids in fixed or stationary machines. Hand grinding, hand polishing, and bench top dry grinding and dry polishing are not included under this definition.

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

Facility maintenance means operations performed as part of the routine repair or renovation of process equipment, machinery, control equipment, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. Facility maintenance also includes operations associated with the installation of new equipment or structures, and any processes as part of janitorial activities. Facility maintenance includes operations on stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Facility maintenance also includes operations performed on mobile equipment, such as fork trucks, that are used in a manufacturing facility and which are maintained in that same facility. Facility maintenance does not include spray-applied coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

Filtration control device means a control device that utilizes a filter to reduce the emissions of MFHAP and other PM.

Grinding means a process performed on a workpiece to remove undesirable material from the surface or to remove burrs or sharp edges. Grinding is done using belts, disks, or wheels consisting of or covered with various abrasives.

Machining means dry metal turning, milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering with machines. Shearing operations cut materials into a desired shape and size, while forming operations bend or conform materials into specific shapes. Cutting and shearing operations include punching, piercing, blanking, cutoff, parting, shearing and trimming. Forming operations include bending, forming, extruding, drawing, rolling, spinning, coining, and forging the metal. Processes specifically excluded are hand-held devices and any process employing fluids for lubrication or cooling.

Material containing MFHAP means a material containing one or more MFHAP. Any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing MFHAP.

Metal fabrication and finishing HAP (MFHAP) means any compound of the following metals: Cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form, with the exception of lead.

Metal fabrication and finishing source categories are limited to the nine metal fabrication and finishing source categories with the activities described in Table 1, "Description of Source Categories Affected by this Subpart." Metal fabrication or finishing operations means dry abrasive blasting, machining, spray painting, or welding in any one of the nine metal fabrication and finishing area source categories listed in Table 1, "Description of Source Categories Affected by this Subpart."

Military munitions means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military

munitions under the control of the DoD, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: Confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

Paint means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, coatings, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered paints for the purposes of this subpart.

Polishing with machines means an operation which removes fine excess metal from a surface to prepare the surface for more refined finishing procedures prior to plating or other processes. Polishing may also be employed to remove burrs on castings or stampings. Polishing is performed using hard-faced wheels constructed of muslin, canvas, felt or leather, and typically employs natural or artificial abrasives. Polishing performed by hand without machines or in bench top operations are not considered polishing with machines for the purposes of this subpart.

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

Quality control activities means operations that meet all of the following criteria:

(1) The activities are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are not sold and do not leave the facility.

(3) The activities are not a normal part of the operation;

(4) The activities do not involve fabrication of tools, equipment, machinery, and structures that comprise the infrastructure of the facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

Responsible official means responsible official as defined in 40 CFR 70.2.

Spray-applied painting means application of paints using a hand-held device that creates an atomized mist of paint and deposits the paint on a substrate. For the purposes of this subpart, spray-applied painting does not include the following materials or activities:

(1) Paints applied from a hand-held device with a paint cup capacity that is less than 3.0 fluid ounces (89 cubic centimeters).

(2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

(3) Painting operations that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; the application of paints that contain fillers that adversely affect atomization with HVLP

spray guns, and the application of paints that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

Spray booth or spray room means an enclosure with four sides and a roof where spray paint is prevented from leaving the booth during spraying by the enclosure. The roof of the spray booth or spray room may contain narrow slots for connecting the parts and products to overhead cranes, or for cord or cable entry into the spray booth or spray room.

Tool or equipment repair means equipment and devices used to repair or maintain process equipment or to prepare molds, dies, or other changeable elements of process equipment.

Totally enclosed and unvented means enclosed so that no air enters or leaves during operation.

Totally enclosed and unvented dry abrasive blasting chamber means a dry abrasive blasting enclosure which has no vents to the atmosphere, thus no emissions. A typical example of this sort of abrasive blasting enclosure is a small "glove box" enclosure, where the worker places their hands in openings or gloves that extend into the box and enable the worker to hold the objects as they are being blasted without allowing air and blast material to escape the box.

Vented dry abrasive blasting means dry abrasive blasting where the blast material is moved by air flow from within the chamber to outside the chamber into the atmosphere or into a control device.

Welding means a process which joins two metal parts by melting the parts at the joint and filling the space with molten metal.

Welding rod containing MFHAP means a welding rod that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or that contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the welding rod.

§63.11523 What General Provisions apply to this subpart?

The provisions in 40 CFR part 63, subpart A, applicable to sources subject to §63.11514(a) are specified in Table 2 of this subpart.

Table 1 to Subpart XXXXXX of Part 63—Description of Source Categories Affected by This Subpart

Metal fabrication and finishing source category	Description
Electrical and Electronic Equipment Finishing Operations	Establishments primarily engaged in manufacturing motors and generators; and electrical machinery, equipment, and supplies, not elsewhere classified. The electrical machinery equipment and supplies industry sector of this source category includes establishments primarily engaged in high energy particle acceleration systems and equipment, electronic simulators, appliance and extension cords, bells and chimes, insect traps, and other electrical equipment and supplies not elsewhere classified. The motors and generators sector of this source category includes establishments primarily engaged in manufacturing electric motors (except engine starting motors) and power generators; motor generator sets; railway motors and control equipment; and motors, generators and control equipment for gasoline, electric, and oil-electric buses and trucks.

Metal fabrication and finishing source category	Description
Fabricated Metal Products	Establishments primarily engaged in manufacturing fabricated metal products, such as fire or burglary resistive steel safes and vaults and similar fire or burglary resistive products; and collapsible tubes of thin flexible metal. Also, establishments primarily engaged in manufacturing powder metallurgy products, metal boxes; metal ladders; metal household articles, such as ice cream freezers and ironing boards; and other fabricated metal products not elsewhere classified.
Fabricated Plate Work (Boiler Shops)	Establishments primarily engaged in manufacturing power marine boilers, pressure and nonpressure tanks, processing and storage vessels, heat exchangers, weldments and similar products.
Fabricated Structural Metal Manufacturing	Establishments primarily engaged in fabricating iron and steel or other metal for structural purposes, such as bridges, buildings, and sections for ships, boats, and barges.
Heating Equipment, except Electric	Establishments primarily engaged in manufacturing heating equipment, except electric and warm air furnaces, including gas, oil, and stoker coal fired equipment for the automatic utilization of gaseous, liquid, and solid fuels. Products produced in this source category include low-pressure heating (steam or hot water) boilers, fireplace inserts, domestic (steam or hot water) furnaces, domestic gas burners, gas room heaters, gas infrared heating units, combination gas-oil burners, oil or gas swimming pool heaters, heating apparatus (except electric or warm air), kerosene space heaters, gas fireplace logs, domestic and industrial oil burners, radiators (except electric), galvanized iron nonferrous metal range boilers, room heaters (except electric), coke and gas burning salamanders, liquid or gas solar energy collectors, solar heaters, space heaters (except electric), mechanical (domestic and industrial) stokers, wood and coal-burning stoves, domestic unit heaters (except electric), and wall heaters (except electric).
Industrial Machinery and Equipment Finishing Operations	Establishments primarily engaged in construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing. The construction machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing heavy machinery and equipment of types used primarily by the construction industries, such as bulldozers; concrete mixers; cranes, except industrial plant overhead and truck-type cranes; dredging machinery; pavers; and power shovels. Also establishments primarily engaged in manufacturing forestry equipment and certain specialized equipment, not elsewhere classified, similar to that used by the construction industries, such as elevating platforms, ship cranes, and capstans, aerial work platforms, and automobile wrecker hoists. The oil and gas field machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing machinery and equipment for use in oil and gas fields or for drilling water wells, including portable drilling rigs. The pumps and pumping equipment manufacturing sector of this source category includes establishments primarily engaged in manufacturing pumps and pumping equipment for general industrial, commercial, or household use, except fluid power pumps and motors. This category includes establishments primarily engaged in manufacturing domestic water and sump pumps.
Iron and Steel Forging	Establishments primarily engaged in the forging manufacturing process, where purchased iron and steel metal is pressed, pounded or squeezed under great pressure into high strength parts known as forgings. The forging process is different from the casting and foundry processes, as metal used to make forged parts is never melted and poured.
Primary Metals Products Manufacturing	Establishments primarily engaged in manufacturing products such as fabricated wire products (except springs) made from purchased wire. These facilities also manufacture steel balls; nonferrous metal brads and nails; nonferrous metal spikes, staples, and tacks; and other primary metals products not elsewhere classified.
Valves and Pipe Fittings	Establishments primarily engaged in manufacturing metal valves and pipe fittings; flanges; unions, with the exception of purchased pipes; and other valves and pipe fittings not elsewhere classified.

Table 2 to Subpart XXXXXX of Part 63—Applicability of General Provisions to Metal Fabrication or Finishing Area Sources

Instructions for Table 2—As required in §63.11523, “General Provisions Requirements,” you must meet each requirement in the following table that applies to you.

Citation	Subject
63.1 ¹	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.5	Construction/reconstruction.
63.6(a), (b)(1)-(b)(5), (c)(1), (c)(2), (c)(5), (g), (i), (j)	Compliance with standards and maintenance requirements.
63.9(a)-(d)	Notification requirements.
63.10(a), (b) except for (b)(2), (d)(1), (d)(4)	Recordkeeping and reporting.
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality.
63.16	Performance track provisions.

¹§63.11514(g), “Am I subject to this subpart?” exempts affected sources from the obligation to obtain title V operating permits.

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

Addendum to the Technical Support Document (ATSD) for a
a New Source Construction and Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name: US Premier Tube Mills
Source Location: 2855 and 2971 Michigan Rd, Madison, IN 47250
County: Jefferson
SIC Code: 3317 (Steel Pipes and Tubes)
Operation Permit No.: M077-46805-00035
Permit Reviewer: Omar El-Rjoob

On May 24, 2024, the Office of Air Quality (OAQ) had a notice posted on IDEM's website (<https://www.in.gov/idem/public-notice/>), stating that US Premier Tube Mills had applied for a New Source Construction and Minor Source Operating Permit (MSOP) to construction and operation of new and unpermitted units at an existing unpermitted stationary source that manufactures steel pipes and tubes. The notice also stated that the OAQ proposed to issue a New Source Construction and Minor Source Operating Permit (MSOP) for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Upon further evaluation, the Unrestricted Source-Wide Emissions Table in Page 7 of the TSD is being corrected as follows:

	Unrestricted Source-Wide Emissions (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Including Fugitives*	23.73	22.85	22.60	0.05	8.20	6.89 37.64	37.64 6.89	10.98	11.28
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
Title V Major Source Thresholds	--	100	100	100	50	50	100	10	25
MSOP Thresholds	25	25	25	25	25	25	100	10	25

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP.
*Fugitive HAP emissions are always included in the source-wide emissions.

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

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1) of ~~PM10, PM2.5, and VOC~~ are each is less than one hundred (100) tons per year, but equal to or greater than twenty-five (25) tons per year. The potential to emit of all other regulated air pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).

There are no changes to the permit due to this correction.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Omar El-Rjoob, 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) 232-4971 or (800) 451-6027, and ask for Omar El-Rjoob or (317) 232-4971.
- (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: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

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

**Technical Support Document (TSD) for a New Source Construction and
Minor Source Operating Permit (MSOP)**

Source Description and Location
--

Source Name:	US Premier Tube Mills
Source Location:	2855 and 2971 Michigan Rd, Madison, IN 47250
County:	Jefferson
SIC Code:	3317 (Steel Pipes and Tubes)
Operation Permit No.:	M077-46805-00035
Permit Reviewer:	Omar El-Rjoob

On July 10, 2023, the Office of Air Quality (OAQ) received an application from US Premier Tube Mills related to the construction and operation of an existing unpermitted new stationary metal tube manufacturing plant.

Source Definition

The following plants are considered in the source determination:

- (a) US Premier Tube Mills' North Building plant is located at 2971 Michigan Road, Madison, IN 47250 (Plant ID 077-00035). This makes steel tubes, and
- (b) US Premier Tube Mills' South Building plant is located at 2855 Michigan Road, Madison, IN 47250 (Plant ID not assigned). This makes steel tubes.

IDEM, OAQ has examined whether these plants are part of the same source. The term "source" is defined at 326 Indiana Administrative Code 2-1-73. The Indiana Administrative Code is available at http://www.in.gov/legislative/iac/iac_title?iact=326 on the Internet. In order for these plants to be considered as a single source, all three of the following criteria must be met:

- (a) The plants must have common ownership and/or control;
- (b) The plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility to the other; and
- (c) The plants must be located on the same, contiguous or adjacent properties.

First Criteria - Common Ownership or Control:

The first criteria to be considered is whether these plants are under common ownership or control. IDEM's Nonrule Policy Document Air-005 applies to the definition of "major source" in 326 IAC 2-7-1(22). Since the definition of major source and source are almost identical, Air-005 is also helpful guidance in defining a source. All of IDEM's nonrule policy documents are available at <https://www.in.gov/idem/resources/nonrule-policies/effective-nonrule-policies/> on IDEM's website. NPD Air-005 states:

Common ownership may exist in several forms.

- If a third party has ownership of fifty-one percent (51%) or more in each of two (2) or more entities, common ownership exists.
- If two (2) or more entities share common corporate officers, in whole or in substantial part, who are responsible for the day-to-day operations of the entities, common ownership exists.

- If one entity has fifty-one percent (51%) or greater ownership of another entity, common ownership exists.

US Premier Tube Mills owns and operates the plants. The 2 plants meet the first criteria of the source definition.

Second Criteria - Common SIC Code or Support Facility:

The second criteria is whether either of the plants have a common two-digit Standard Industrial Classification (SIC) Code or if one plant serves as a support facility for the other plant. The Standard Industrial Classification Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at <https://www.osha.gov/data/sic-manual> on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant.

The plants make metal tubes. The plants have the two-digit SIC Code 33 for the Major Group Primary Metal Industries. The 2 plants meet the second criteria of the source definition.

Since they meet the second criteria of the source definition, it is not necessary to determine whether the plants have a support facility relationship.

Third Criteria - Same, Contiguous, or Adjacent Properties:

The third and last criteria of the source definition is whether the plants are on the same, contiguous or adjacent properties. Plants located on properties that share a common property border are contiguous.

The 2 plants are located on properties that share a common property border. The plants are located on contiguous properties. The 2 plants meet the third criteria of the source definition.

Source Determination - Final Conclusion:

The 2 plants do meet all three criteria of the source definition. IDEM, OAQ finds that the 2 plants (US Premier Tube Mills' North Building and South Building plants) are part of the same source.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Jefferson County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO ₂	Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO ₂ standard. Cannot be classified effective March 3, 1978, for the national secondary standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.

Pollutant	Designation
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Jefferson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Jefferson County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Jefferson 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 (326 IAC 2-7) and MSOP (326 IAC 2-6.1) 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_4q18.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.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by US Premier Tube Mills on July 10, 2023, relating to construction and operation of new and unpermitted units at an existing unpermitted stationary source that manufactures steel pipes and tubes.

The following emission units that are new and existing that were constructed and/or operated without a permit:

- (1) Emission units located in the North Building located at 2971 Michigan Road, Madison, IN 47250:
 - (a) One (1) manual powder coating line, identified as NPC1, approved in 2024 for construction, with a maximum capacity of 54.77 pounds of powder per hour, coating metal, using an integral primary cartridge filter as powder recovery device, and the secondary filter as a particulate control, and exhausting indoors.
 - (b) One (1) natural gas fired dry off oven, identified as NDO1, approved in 2024 for construction, with a maximum capacity of 4 million British thermal units per hour, using no control and exhausting through stack NDOS1.
 - (c) One (1) natural gas fired curing oven, identified as NCO1, approved in 2024 for construction, with a maximum capacity of 4 million British thermal units per hour, using no control and exhausting through stack NCOS1.
 - (d) One (1) natural gas fired boiler, identified as NB1, approved in 2024 for construction, with a maximum capacity of 3.5 million British thermal units per hour, using no control and exhausting through stack NBS1.
 - (e) One (1) 4-stage clean/prep line for powder coating, identified as NPCWL1, approved in 2024 for construction, with a maximum capacity of 0.1 of gallon of solvent per hour, using no control, and exhausting indoors.
 - (f) Fifteen (15) coil slitters, identified as NCS1 through NCS15, constructed in 2017, each with a maximum cutting rate of 4200 inches per minute, using no control and exhausting indoors.
 - (g) One (1) coil slitter rust prevention coating application line, identified as NCSCA1, constructed in 2017, utilizing misting system application, with a maximum capacity of 8.65 gallons of a rust prevention liquid per day, using no control and exhausting indoors.
 - (h) One (1) TIG sheet butt welder, identified as NBW1, constructed in 2019, with a maximum electrode consumption rate of 0.1 pounds per hour, using no control, and exhausting indoor.

The TIG welder is affected sources under NESHAP 40 CFR 63, Subpart XXXXXX.
 - (i) One (1) high-frequency tube welder, identified as NHFW1 with no emissions, constructed in 2012.
 - (j) One (1) outer diameter scarfing tool, identified as NOS1, constructed in 2019, with a maximum capacity of 0.3 tons per hour, using no control, and exhausting indoors.
 - (k) One (1) re-metalizing line, identified as NRM1, constructed in 2019, with a maximum capacity of 2.5 pounds per hour, using no control, and exhausting indoors.
 - (l) One (1) tube mill cooling line, identified as NCL1, constructed in 2019, with a maximum capacity of 1,584 gallons per year, using no control, and exhausting indoors.

- (m) One (1) tube mills wash line cleaner, identified as NWL1, constructed in 2019, with a maximum capacity of 2,640 gallons of solvent per year, using no control, and exhausting indoors.
 - (n) One (1) clear coat vacuum coater line, identified as NVC1, constructed in 2019, with a maximum capacity of 31.68 gallons of coating per day, using no control, and exhausting indoors.
 - (o) One (1) cutoff saw, identified as NCOS1, constructed in 2019, with a maximum cutting rate of 3000 inches per minute, using no control and exhausting indoors.
 - (p) One (1) cooling tower, identified as NCT1, constructed in 2010, with a maximum recirculation rate of 405 gallons per minute, using no control and exhausting outdoors.
- (2) Emission units located in the South Building located at 2855 Michigan Road, Madison, IN 47250:
- (a) One (1) manual powder coating line, identified as SPC1, constructed in 2010, with a maximum capacity of 54.77 pounds of powder per hour, coating metal, using an integral primary cartridge filter as powder recovery device, and the secondary filter as a particulate control, and exhausting indoors.
 - (b) Four (4) natural gas combustion units, using no control, consisting of the following:

Emission Unit	Unit ID	Maximum Throughput (MMBtu/hr)	Year Constructed
Wash Line Stage 1 Heater	SWLH1	2.0	2010
Dry off Oven	SDO1	1.5	2010
Powder Coat Curing Oven	SCO1	2.5	2010
Powder Coat Curing Oven	SCO2	1.6	2010

- (c) Four (4) TIG sheet butt welders, identified as SBW1 through SBW4, constructed in 2012, each with a maximum electrode consumption rate of 0.1 pounds per hour, using no control, and exhausting indoors.

The four (4) TIG welders are affected sources under NESHAP 40 CFR 63, Subpart XXXXXX.
- (d) Four (4) high-frequency tube welders, identified as SHFW1 through SHFW4 with no emissions, constructed in 2012.
- (e) Four (4) outer diameter scarfing tools, identified as SOS1 through SOS4, constructed in 2012, each with a maximum capacity of 0.3 tons per hour, using no control, and exhausting indoors.
- (f) Four (4) re-metalizing lines, identified as SRM1 through SRM4, constructed in 2019, each with a maximum capacity of 2.5 pounds per hour, using no control, and exhausting indoors.
- (g) Four (4) tube mill cooling lines, identified as SCL1 through SCL4, constructed in 2019, each with a maximum capacity of 1,584 gallons per year, using no control, and exhausting indoors.
- (h) Four (4) tube mills washing, identified as SWL1 through SWL4, constructed in 2019, each with a maximum capacity of 2,640 gallons of solvent per year, using no control, and exhausting indoors.

- (i) Four (4) clear coat vacuum coater lines, identified as SVC1 through SVC4, constructed in 2019, each with a maximum capacity of 31.68 gallons of coating per day, using no control, and exhausting indoors.
 - (j) Four (4) cutoff saws, identified as SCOS1 through SCOS4, constructed in 2019, each with a maximum cutting rate of 3000 inches per minute, using no control and exhausting indoors.
 - (k) Two (2) cooling towers, identified as SCT1 through SCT2, constructed in 2010, each with a maximum recirculation rate of 405 gallons per minute, using no control and exhausting outdoors.
 - (l) One (1) 5-stage clean/prep cleaner for powder coating, identified as SPCWL1, constructed in 2010, with a maximum capacity of 0.1 gallon of solvent per hour, using no control and exhausting indoors.
- (3) North and Buildings:
- (a) Paved Roads

“Integral Part of the Process” Determination

US Premier Tube Mills submitted the following information to justify why the primary cartridge filters should be considered an integral part of two (2) powder coating lines (NPC1 and SPC1):

- (a) A primary cartridge filter has been installed in each of the two (2) powder coating lines (NPC1 and SPC1), even if there were no air quality regulations. The primary purpose of the primary cartridge filters is to collect and reuse powder coatings.
- (b) The primary cartridge filters are integral to the powder coating lines NPC1 and SPC1 because they act as a product recovery device.
- (c) The primary cartridge filters on lines NPC1 and SPC1 have a positive net economic effect by serving as recovery devices for powder coatings which can be reused and thereby reduce purchasing costs. The total cost of installation, operation, and maintenance of the cartridge filters is far less than the net savings the source receives from recovering otherwise lost powder coating material.

US Premier Tube Mills estimates cost savings from the primary cartridge filters for the powder recovery device for NPC1 at approximately \$176,811 per year.

US Premier Tube Mills estimates cost savings from the primary cartridge filters for the powder recovery device for SPC1 at approximately \$142,509 per year.

Estimates conservatively use the lowest price per pound of powder coating material and still demonstrate a significant cost benefit.

The cost analysis of the primary cartridge filters is in the attached Appendix C.

- (d) The purpose of coating filters is to collect and reuse the coating powder, which saves the company a lot of money.

IDEM, OAQ evaluated the information submitted and agrees that primary cartridge filters should be considered an integral part of the two (2) powder coating lines (NPC1 and SPC1) because their main function is to recover used powder and re-used it. Therefore, the potential to emit particulates from two (2) powder coating lines (NPC1 and SPC1) was calculated after the powder

coating primary filters for purposes of determining the permitting level and applicability of 326 IAC 2-2 and 326 IAC 6-3. Operating conditions in the proposed permit will specify that the primary cartridge filters shall operate at all times the two (2) powder coating lines (NPC1 and SPC1) are in operation.

The two (2) powder coating lines (NPC1 and SPC1) use a secondary filter as a particulate control, and no powder is re-used from the secondary filter, so the secondary filter is not considered an integral part of the two (2) powder coating lines (NPC1 and SPC1).

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit and operating rules.

Emission Calculations

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

Permit Level Determination – MSOP

This table reflects the unrestricted potential emissions of the source. 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.

	Unrestricted Source-Wide Emissions (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Including Fugitives*	23.73	22.85	22.60	0.05	8.20	6.89	37.64	10.98	11.28
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
Title V Major Source Thresholds	--	100	100	100	50	50	100	10	25
MSOP Thresholds	25	25	25	25	25	25	100	10	25

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP.
 *Fugitive HAP emissions are always included in the source-wide emissions.

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

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1) of PM₁₀, PM_{2.5}, and VOC are each less than one hundred (100) tons per year, but equal to or greater than twenty-five (25) tons per year. The potential to emit of all other regulated air pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an Minor Source Operating Permit (MSOP).

Federal Rule Applicability Determination

Federal rule applicability for this source has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for natural gas-fired boiler (NB1), because the maximum design heat input capacity of NB1 meeting the definition of steam generating unit in 40 CFR 60.41c is less than 2.9 MW (10 MMBtu/hr).
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) **Boiler:**
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart DDDDD and 326 IAC 20-14 are not included in the permit for this source, since the source is not a major source of HAP as defined in 40 CFR part 63, subpart A, §63.2.
- (b) **Boiler:**
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J) are not included in the permit for this source, since the natural gas-fired boiler (NB1) is a gas-fired boiler and is specifically exempted under 40 CFR 63.11195(e).
- (c) **Powder coating lines:**
The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX (6X), are not included in the permit for the powder coating lines (NPC1) and (SPC2), because powder coating does not meet the definition of spray-applied painting in 40 CFR 63.11522. In addition, the powder coating lines (NPC1) and (SPC2) do not use coatings that contain metal fabrication or finishing metal HAP (MFHAP).
- (d) **Welders:**
This source is subject to the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63, Subpart XXXXXX, because the operations at these facilities involve usage of materials that contain finishing metal HAPs (MFHAP) (i.e., compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead) or these facilities have potential to emit of finishing metal HAPs (MFHAP).

The units subject to this rule include the following: the sheet butt welder identified as NBW1, and the four (4) sheet butt welders identified as SBW1 through SBW4.

This source is subject to the following portions of Subpart XXXXXX:

- (1) 40 CFR 63. 11514(a),(2),(b),(5)(c)(i)
- (2) 40 CFR 63. 11515(a)
- (3) 40 CFR 63. 11516(b)(1)&(2) , (f)(1)(2 i, ii, iii, iv, v)
- (4) 40 CFR 63. 11519(a I, ii, iii, iv),(2 i, ii),(2 i, ii, iii), (c)(1 through 4), (c)(11 through 15)
- (5) 40 CFR 63. 11521
- (6) 40 CFR 63. 11522

- (7) 40 CFR 63. 11523
- (8) Table 1
- (9) Table2

Compliance Assurance Monitoring (CAM):

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

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

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

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

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

The operation of this source 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)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70), it is not located in Lake or Porter County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule 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 forty percent (40%) 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)

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Jefferson County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

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

State Rule Applicability – Individual Facilities

State rule applicability for this source has been reviewed as follows:

Powder Coating line (NPC1)

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

Since the powder coating line (NPC1) has potential emissions less than 0.551 pound per hour after consideration of the integral control device, pursuant to 326 IAC 6-3-1(b)(14), it is exempt from the requirements of 326 IAC 6-3-2.

However, since the powder coating line (NPC1) has potential emissions greater than 0.551 pound per hour prior to consideration of the integral control device, in order to assure the powder coating line (NPC1) is not subject to the requirements of 326 IAC 6-3-2, the integral control device shall be in operation and control emissions from the powder coating line (NPC1) at all times the powder coating line (NPC1) is in operation.

4-Stage Wash Line Cleaner Application (NPCWL1)

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, the one (1) 4-stage wash line (NPCWL1) was constructed after January 1, 1980, is not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Fifteen (15) coil slitters (NCS1 through NCS15)

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

Pursuant to 326 IAC 6-3-1(b)(14), the fifteen (15) coil slitters, identified as NCS1 through NCS15, are not subject to the requirements of 326 IAC 6-3, since each unit has a PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

One (1) coil slitter rust prevention coating application (NCSCA1)

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

Pursuant to 326 IAC 6-3-1(b)(14), the coil slitter rust prevention coating application, identified as NCSCA1, is not subject to the requirements of 326 IAC 6-3, since it has the PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, this coil slitter rust prevention coating application, identified as NCSCA1, was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because it is subject to 326 IAC 8-2-9.

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

- (a) Pursuant to 326 IAC 8-2-1(a) and 326 IAC 8-2-9(a), the coil slitter rust prevention coating application, identified as NCSCA1 is subject to the requirements of 326 IAC 8-2-9, since it was constructed in 2017, located in Jefferson County, and has unlimited PTE of VOC equal to or greater than 15 pounds of VOC per day, and this source performs miscellaneous metal surface coating under the standard industrial classification code of major group #33.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the coil slitter rust prevention coating application, identified as NCSCA1, shall be not exceed 3.5 pounds of VOC per gallon of coating less water.

- (b) This coil slitter rust prevention coating application, identified as NCSCA1 is also subject to the work practices specified under 326 IAC 8-2-9(f).

- (c) Based on the SDS submitted by the source and calculations made, the coil slitter rust prevention coating application, identified as NCSCA1, is able to comply with this requirement by using only as-applied compliant coatings.

One (1) sheet butt welder

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

Pursuant to 326 IAC 6-3-1(b)(14), the one (1) sheet butt welder, identified as NBW1, is not subject to the requirements of 326 IAC 6-3, since the unit has a PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

OD Scarfing (NOS1)

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

Pursuant to 326 IAC 6-3-1(b)(14), the od scarfing, identified as NOS1, is not subject to the requirements of 326 IAC 6-3, since it has the PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Re-Metalizing (NRM1)

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

Pursuant to 326 IAC 6-3-1(b)(14), the re-metalizing, identified as NRM1, is not subject to the requirements of 326 IAC 6-3, since it has the PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Coolant Application (NCL1)

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, the coolant application, identified as NCL1 was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

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

Pursuant to 326 IAC 8-2-9(b) the coolant application, identified as NCL1, is not subject to the requirements of 326 IAC 8-2-9 because the unlimited PTE of VOC less than 15 pounds of VOC per day.

Wash Line Cleaner Application (NWL1)

326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements)

Pursuant to 326 IAC 8-3-1(c)(2)(A) and 326 IAC 8-3-1(c)(3), 326 IAC 8-3-2 is applicable to one (1) wash line (NWL1) located at this source, because it is a cold cleaner degreaser without a remote solvent reservoir that was constructed after July 1, 1990, and it uses solvents that contain greater than 1% VOC by weight.

326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers)

Pursuant to 326 IAC 8-3-8 (a)(2) the one (1) wash line (NWL1) is subject to the material requirements for cold cleaner degreasers.

Clear Coat Vacuum Coater (NVC1)

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

Pursuant to 326 IAC 6-3-1(b)(14), the clear coat vacuum coater, identified as NVC1, is not subject to the requirements of 326 IAC 6-3, since it has the PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, this the clear coat vacuum coater, identified as NVC1, was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because it is subject to 326 IAC 8-2-9.

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

- (a) Pursuant to 326 IAC 8-2-1(a) and 326 IAC 8-2-9(a), the clear coat vacuum coater, identified as NVC1 is subject to the requirements of 326 IAC 8-2-9, since it was constructed in 2017, located in Jefferson County, and has the unlimited PTE of VOC equal to or greater than 15 pounds of VOC per day, and this source performs miscellaneous metal surface coating under the standard industrial classification code of major group #33.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the clear coat vacuum coater, identified as NVC1 shall be not exceed 3.5 pounds of VOC per gallon of coating less water.

- (b) This clear coat vacuum coater, identified as NVC1, is also subject to the work practices specified under 326 IAC 8-2-9(f).
- (c) Based on the SDS submitted by the source and calculations made, the clear coat vacuum coater, identified as NVC1, is able to comply with this requirement by using only as-applied compliant coatings.

Cutoff Saw (NCOS1)

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

Pursuant to 326 IAC 6-3-1(b)(14), the cutoff saw, identified as NCOS1, is not subject to the requirements of 326 IAC 6-3, since it has the PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Cooling Tower (NCT1)

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

Pursuant to 326 IAC 6-3-1(b)(14), the cooling tower, identified as NCT1, is not subject to the requirements of 326 IAC 6-3, since it has the PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

- (2) Emission units included in the south building plant located at 2855 Michigan Road, Madison, IN 47250:

Powder Coating line (SPC1)

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the powder coating line, identified SPC1, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the powder coating line, identified SPC1 shall not exceed 0.36 pounds per hour when operating at a process weight rate of 0.027 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The secondary filter shall be in operation at all times the powder coating line (SPC1) is in operation in order to comply with this limit.

Four (4) sheet butt welders

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

Pursuant to 326 IAC 6-3-1(b)(14), the four (4) sheet butt welders, identified as SBW1 through SBW4, are not subject to the requirements of 326 IAC 6-3, since each unit has a PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Four (4) OD Scarfing lines (SOS1 through SOS4)

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

Pursuant to 326 IAC 6-3-1(b)(14), the four (4) od scarfing lines, identified as SOS1 through SOS4, are not subject to the requirements of 326 IAC 6-3, since each unit has a PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Four (4) Re-Metalizing lines (SRM1 through SRM4)

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

Pursuant to 326 IAC 6-3-1(b)(14), the four (4) re-metalizing lines, identified as SRM1 through SRM4, are not subject to the requirements of 326 IAC 6-3, since each unit has a PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Four (4) Coolant Application lines (SCL1 through SCL4)

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, the four (4) coolant application lines, identified as SCL1 through SCL4 were constructed after January 1, 1980, are not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

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

Pursuant to 326 IAC 8-2-9(b) the four (4) coolant application lines, identified as SCL1 through SCL4, are not subject to the requirements of 326 IAC 8-2-9 because each line unlimited PTE of VOC less than 15 pounds of VOC per day.

Four (4) Wash Line Cleaner Applications (SWL1 through SWL4)

326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements)

Pursuant to 326 IAC 8-3-1(c)(2)(A) and 326 IAC 8-3-1(c)(3), 326 IAC 8-3-2 is applicable to the (4) wash lines SWL1 through SWL4 located at this source, because they are cold cleaner degreasers without a remote solvent reservoir that was constructed after July 1, 1990, and it uses solvents that contain greater than 1% VOC by weight.

326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers)

Pursuant to 326 IAC 8-3-8 (a)(2) the (4) wash lines SWL1 through SWL4 are subject to the material requirements for cold cleaner degreasers.

Four (4) Clear Coat Vacuum Coaters (SVC1 through SVC4)

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

Pursuant to 326 IAC 6-3-1(b)(14), the four (4) clear coat vacuum coaters, identified as SVC1 through SVC4, are not subject to the requirements of 326 IAC 6-3, since each unit has a PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, these four (4) clear coat vacuum coaters, identified as SVC1 through SVC4, were constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because it is subject to 326 IAC 8-2-9.

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

- (a) Pursuant to 326 IAC 8-2-1(a) and 326 IAC 8-2-9(a), the four (4) clear coat vacuum coaters, identified as SVC1 through SVC4 are subject to the requirements of 326 IAC 8-2-9, since they were constructed in 2019, located in Jefferson County, and each has unlimited PTE of VOC equal or greater than 15 pounds of VOC per day, and this source performs miscellaneous metal surface coating under the standard industrial classification code of major group #33. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the four (4) clear coat vacuum coaters, identified as SVC1 through SVC4 shall be not exceed 3.5 pounds of VOC per gallon of coating less water.
- (b) These four (4) clear coat vacuum coaters, identified as SVC1 through SVC4 are also subject to the work practices specified under 326 IAC 8-2-9(f).
- (c) Based on the MSDS submitted by the source and calculations made, the four (4) clear coat vacuum coaters, identified as SVC1 through SVC4, are able to comply with this requirement by using only as-applied compliant coatings.

Four (4) Cutoff Saws (SCOS1 through SCOS4)

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

Pursuant to 326 IAC 6-3-1(b)(14), the four (4) cutoff saws, identified as SCOS1 through SCOS4, are not subject to the requirements of 326 IAC 6-3, since each has a PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Two (2) Cooling Towers (SCT1 and SCT2)

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

Pursuant to 326 IAC 6-3-1(b)(14), the four (4) cooling towers, identified as SCT1 and SCT2, are not subject to the requirements of 326 IAC 6-3, since each has a PM potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

5-Stage Wash Line Cleaner Application (SPCWL1)

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, the one (1) 5-stage wash line (SPCWL1) was constructed after January 1, 1980, is not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Three (3) natural gas-fired cure ovens

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

The three (3) natural gas-fired cure ovens are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.

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

The three (3) natural gas-fired cure ovens are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit sulfur dioxide

(SO₂) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, these three (3) natural gas-fired cure ovens were constructed after January 1, 1980, are not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the three (3) natural gas-fired cure ovens, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the three (3) natural gas-fired cure ovens, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Two (2) natural gas-fired dry off ovens and natural gas-fired wash line heater

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

The two (2) natural gas-fired dry off ovens and the natural gas-fired wash line heater are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.

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

The two (2) natural gas-fired dry off ovens and the natural gas-fired wash line heater are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

This emission units are not subject to 326 IAC 326 IAC 7-1.1 because they have a potential to emit (or limited potential to emit) sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, the two (2) natural gas-fired dry off ovens units and the natural gas-fired wash line heater were constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the two (2) natural gas-fired dry off ovens and the natural gas-fired wash line heater, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the two (2) natural gas-fired dry off ovens and the natural gas-fired wash line heater, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

One (1) natural gas-fired boiler (NB1)

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired boiler (NB1) unit is subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) because, pursuant to 326 IAC 1-2-19, this emission unit do meet the definition of an indirect heating unit.

Pursuant to 326 IAC 6-2-1(d), indirect natural gas-fired boiler unit that received permit to construct after September 21, 1983, is subject to the requirements of 326 IAC 6-2-4. Therefore, the natural gas-fired

boiler, identified as NB1, is subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

The determination for Q is listed below for all of the indirect heating units located at the facility including changes as a result of addition or subtraction of all units over time.

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
NB1	2024	3.5	3.5	0.78	0.6	0.002

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The natural gas-fired boiler (NB1), is not subject to 326 IAC 7-1.1 because this unit has a potential to emit (or limited potential to emit) sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, the natural gas-fired boiler (NB1) was constructed after January 1, 1980, is not subject to the requirements of 326 IAC 8-1-6 because this unit has a potential to emit (VOC) of less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the natural gas-fired boiler (NB1), because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the natural gas-fired boiler (NB1), since the natural gas-fired boiler (NB1) is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements

- (a) The Compliance Determination Requirements applicable to this source are as follows:
 - (1) The source is able to demonstrate compliance with the VOC content and usage limits by keeping records of their total coating material, coating material and solvent usage, cleanup solvent usage, and the VOC contents of each coating material and solvent.

(2) At this time, there are no testing requirements applicable to this source.

(b) The Compliance Monitoring Requirements applicable to this source are as follows:

Emission Unit/ Control Device	Type of parametric Monitoring	Frequency	Range or Specification
Manual powder coating operation (SPC1)/ secondary dust filter	Secondary Dust Filter Inspections	Daily	Verify the placement, integrity and particle loading of the filters

These monitoring conditions are necessary because the secondary dust filter for the manual powder coating operation (SPC1) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

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 July 10, 2023. Additional information was received on February 23, 2024.

The construction of the proposed new and modified emission units and the operation of this source shall be subject to the conditions of the attached proposed New Source construction and MSOP No. 077-46805-00035. The staff recommends to the Commissioner that the New Source construction and MSOP be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Omar El-Rjoob, 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) 232-4971 or (800) 451-6027, and ask for Omar El-Rjoob or (317) 232-4971.
- (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: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

Appendix A: Emission Calculations
Emissions Summary

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

Uncontrolled PTE (tons/yr)										
Unit ID	Emission Unit Description	PM	PM10	PM2.5	SO2	NOx	CO	VOC	Max Single HAPs	Total HAPs
North Building										
NPC1	Powder Coating Line	0.06	0.06	0.06	-	-	-	-	-	-
NDO1, NCO1 and NB1	Natural gas combustion units (North Building)	0.09	0.38	0.38	0.03	4.94	4.15	0.27	0.09	0.09
NPCWL1	4-stage clean/prep line for powder coating	-	-	-	-	-	-	0.04	0.00	0.00
NCS1 through NCS15	Coil Slitters	10.33	10.33	10.33	-	-	-	-	3.44	3.44
NCSCA1	Coil Slitter Rust Prevention Coating Application	0.05	0.05	0.05	-	-	-	5.22	-	-
NBW1	Sheet Butt Welder	0.00	0.00	0.00	-	-	-	-	0.00	0.00
NHFW1	High-Frequency Tube Welder	0.00	0.00	0.00	-	-	-	-	0.00	0.00
NOS1	OD Scarfing tool	0.04	0.04	0.04	-	-	-	-	-	-
NRM1	Re-metalizing	0.55	0.55	0.55	-	-	-	-	-	-
NCL1	Tube mills Wash Line Cleaner Application	-	-	-	-	-	-	1.85	0.00	0.00
NWL1	Wash Line Cleaner Application	-	-	-	-	-	-	0.59	-	-
NVC1	Clear Coat Vacuum Coater	0.22	0.22	0.22	-	-	-	3.93	0.63	0.69
NCOS1	Cutoff Saw	0.49	0.49	0.49	-	-	-	-	0.16	0.16
NCT1	Cooling Tower	1.14	1.14	1.14	-	-	-	-	-	-
South Building										
SPC1	Powder Coating Line	3.00	3.00	3.00	-	-	-	-	-	-
SWLH1, SDO1, SCO1 and SCO2	Natural gas combustion units (South Building)	0.06	0.25	0.25	0.02	3.26	2.74	0.18	0.01	0.01
SBW1 to 4	Sheet Butt Welders	0.00	0.00	0.00	-	-	-	-	3.44	3.44
SHFW1 to 4	High Frequency Tube Welders	0.00	0.00	0.00	-	-	-	-	0.00	0.00
SOS1 to 4	OD Scarfing tools	0.17	0.17	0.17	-	-	-	-	-	-
SRM1 to 4	Re-metalizing lines	2.19	2.19	2.19	-	-	-	-	-	-
SCL1 to 4	Tube mill cooling lines	-	-	-	-	-	-	7.40	0.01	0.01
SWL1 to 4	Tube mills Wash Line Cleaner Application	-	-	-	-	-	-	2.38	-	-
SVC1 to 4	Clear Coat Vacuum Coaters	0.89	0.89	0.89	-	-	-	15.74	2.53	2.76
SCOS1 to 4	Cutoff Saws	0.49	0.49	0.49	-	-	-	-	0.66	0.66
SCT1	Cooling Tower	1.14	1.14	1.14	-	-	-	-	-	-
SCT2	Cooling Tower	1.14	1.14	1.14	-	-	-	-	-	-
SPCWL1	5-Stage Wash Line Cleaner Application	-	-	-	-	-	-	0.04	-	0.00
Paved Road										
		1.68	0.34	0.08	-	-	-	-	-	-
Uncontrolled PTE Including Fugitives		23.73	22.85	22.60	0.05	8.20	6.89	37.64	10.98	11.28

**Appendix A: Emissions Calculations
Powder Coating**

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
 2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

Potential PM Emissions:

Unit ID	Powder Coating Stations	Anticipated Maximum Annual Usage	PTE Hourly Application Rate	Transfer Efficiency	Uncontrolled Emission		Integral primary filter Efficiency*	Potential PM Emissions after integral		Secondary filter Efficiency	PM Emissions after control	
		(lbs/yr)	(lbs/hr)	(%)	(lbs/hr)	(TPY)	(%)	(lbs/hr)	(TPY)	(%)	(lbs/hr)	(TPY)
SPC1	Powder Coating Line (South)											
	PNL326012 Gloss Black LC 26012 Pol. TGIC	471,288	53.80	75.0%	13.45	58.91	95.0%	0.67	2.95	75.0%	0.168	0.74
	PVL228762 Fence Green 28762 Pol. TGIC	8,470	0.97	75.0%	0.24	1.06	95.0%	0.01	0.05	75.0%	0.00302	0.01
	Total PM Emissions (TPY)											
								3.00				0.75
NPC1	Powder Coating Line (North)											
	PNL326012 Gloss Black LC 26012 Pol. TGIC	471,288	53.80	75.0%	13.45	58.91	99.9%	0.01	0.06	95.0%	0.001	0.00
	PVL228762 Fence Green 28762 Pol. TGIC	8,470	0.97	75.0%	0.24	1.06	99.9%	0.00	0.00	95.0%	0.00001	0.00
	Total PM Emissions (TPY)											
								0.06				0.00

Notes:

Transfer efficiency (TE) for electrostatic powder application is 75%.

* NPC1 - The primary set of filters (Nordson #156996 cartridge filter) are integral to the powder booth and function to capture the majority of overspray powder (>99.9%) for collection and reuse.

The secondary set of filters catch any remaining particles (95%) that get through the primary filters.

* SPC1 - The primary set of filters (Koch #CH11H138336 and #CH33H13845 cartridge filters) are integral to the powder booth and function to capture the majority of overspray powder (>95%) for collection and reuse.

The secondary set of filters catch any remaining particles (75%) that get through the primary filters.

Methodology:

Potential PM Emissions (lbs/hr) = Application Rate (lbs/hr) x (1 - Transfer Efficiency%)

Potential PM Emissions (TPY) = Uncontrolled Potential PM Emissions (lbs/hr) x 8760 hrs/yr / 2000

Controlled Emissions (lbs/hr) = Uncontrolled PTE PM/PM10/PM2.5 (lbs/hr) x (1 - Control Efficiency)

Controlled Emissions (TPY) = Controlled PTE PM/PM10/PM2.5 (lbs/hr) x 8760 hrs/year/ 2000

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

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

Process	Number of Stations	Maximum electrode consumption per station (lbs/hr)	Maximum electrode consumption per station (lbs/day)		Emission Factors* (lb pollutant/lb electrode)				Potential to Emit (tons/year)				HAPs (tons/year)
					PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	
North Plant													
Tungsten Inert Gas (TIG)(carbon steel)	1	0.1	2.4		0.0055	0.0005			0.002	0.000	0.000	0.000	0.000
***High Frequency Electric Resistance Welding	1	0	0		0.0055	0.0005			0.000	0.000	0.000	0.000	0.000
South Plant													
Tungsten Inert Gas (TIG)(carbon steel)	4	0.1	2.4		0.0055	0.0005			0.002	0.001	0.000	0.000	0.002
***High Frequency Electric Resistance Welding	4	0	0		0.0055	0.0005			0.000	0.000	0.000	0.000	0.000
Plasma Cutting													
	Number of Stations	Maximum Metal Thickness Cut (inches)	Maximum Metal Cutting Rate (inches/minute)	Maximum Metal Cutting Rate (inches/hour)	Emission Factors2 (lb pollutant/1,000 inches cut, 1 inch thick)**			Potential to Emit (tons/year)				HAPs (tons/year)	
					PM/PM10/PM2.5	Metal HAPs		PM/PM10/PM2.5	Mn	Ni	Cr		
North Plant													
Coil Slitting (Cutting)	15	0.16	4200	252000	0.0039	0.0013		10.331	3.444	0.000	0.000	3.444	
Cutoff Saw	1	0.16	3000	180000	0.0039	0.0013		0.492	0.164	0.000	0.000	0.164	
South Plant													
Cutoff Saws	4	0.16	3000	180000	0.0039	0.0013		1.968	0.656	0.000	0.000	0.656	
Totals													
Potential to Emit (tons/year)								12.80	4.26	0.00	0.00	4.27	

Methodology:

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

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

Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

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

Plasma cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hr) x (Emission Factor, lb pollutant/1,000 inches cut, 8 mm thick)

Cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Thickness, inches) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hour) x (Emission Factor, lb pollutant/1,000 inches cut, 1" thick)

Welding: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum electrode consumption per station, lbs/hr) x (Emission Factor, lb pollutant/lb of electrode used)

Potential to Emit (lbs/day) = Potential to Emit (lbs/hr) x (24 hours/day)

Potential to Emit (tons/year) = Potential to Emit (lbs/hr) x (8,760 hours/year) x (1 ton/2,000 lbs)

*** High frequency electric resistance welding (HFERW) is a process that uses high-frequency currents to concentrate the welding heat at the desired location. The weld is not filled with other components, i.e., no electrode is needed. At the soldering temperature, the weld of the forged structure is extruded by a squeeze roll. Since no electrode is consumed and requires minimum heat input (to produce narrow heat-affected zone, particulate emissions from HFERW is

**Appendix A: Emissions Calculations
OD Scarfing**

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

Parameter	Units	Unit ID	Unit ID
		NOS1	SOS1 to 4
		Value	Value
Number of Lines		1	4
Hourly Throughput ¹	ton/hr	0.3	1.2
PTE Annual Operating Hours	hr/year	8,760	8,760
PM Emission Factor ²	lb/ton	0.032	0.032
PM ₁₀ /PM _{2.5} Emission Factor ^{2,3}	lb/ton	0.032	0.032
Potential PM Emissions	lb/hr	0.009504	0.038016
	ton/year	0.04	0.17
Potential PM10/PM2.5 Emissions	lb/hr	0.009504	0.038016
	ton/year	0.04	0.17

1. After welding, the outer diameter (OD) weld bead created by the forge-welding process is removed using an OD Scarfing tool to create a smooth surface. The Facility's maximum tube milling process rate is approximately 27 tons/hr. For a conservative estimate of the potential-to-emit (PTE), an additional 10% safety factor is applied to the hourly steel milling rate. Hourly throughput for OD scarfing is estimated based on the weight of the forge-welded section (estimated to be 5% of the total tubes weight).

2. The PM emission factor is from the EPA WebFIRE database (<https://cfpub.epa.gov/webfire/SearchEmissionFactor/factorSearch2.cfm>), SCC# 3-04-003-60 (Castings Finishing).

3. PM₁₀ and PM_{2.5} are assumed to be equal to PM for a conservative estimate.

Methodology:

Potential to Emit (tons/year) = Potential to Emit (lbs/hr) x (8,760 hours/year) x (1 ton/2,000 lbs)

**Appendix A: Emissions Calculations
Re-metalizing Operations**

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
 2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

Unit ID	Process	Number of Tube Mill Lines	Anticipated Max. Annual Usage for each line of Molten Zinc Material		Deposition Rate (%)	Potential PM Emissions	
			(lbs/day)	(lbs/yr)		(lbs/hr)	(TPY)
NRM1	Remetalizing	1	60	21,900	95%	0.13	0.55
SRM1 to 4	Remetalizing	4	240	87,600	95%	0.50	2.19

Notes:

For a conservative estimate, it is assumed that PM2.5 and PM10 emissions are equal to PM emissions.

Methodology:

Potential PM Emissions (lbs/hr) = Application Rate (lbs/hr) x (1 - Deposition Rate%)

Potential PM Emissions (TPY) = Potential PM Emissions (lbs/hr) x 8760 hrs/yr / 2000

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

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

Unit ID	Material	Density (lbs/gal)	Weight % Volatile (water, VOC, and exempt compounds*)	Weight % water and exempt compounds*	Weight % VOC	Volume % water and exempt compounds *	Volume % Solids	Maximum Material Usage (gal/unit)	Maximum Capacity (units/hour)	Maximum Material Usage (gal/day)	Pounds VOC per gallon of coating less water and exempt compounds	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	Uncontrolled PTE of PM10/PM2.5 (tons/year)	Pounds VOC per gallon of coating solids	Transfer Efficiency	
NCSCA1	G&G RP-110 MS (rust prevention)	6.90	77.00%	29.00%	48.00%	78.90%	21.10%	0.012	30.000	8.640	15.70	3.31	1.19	28.62	5.22	0.05	15.70	98%	
NVC1	Duratop ACW Clear W-1735HV Rev. #6 (Water-based coating/rust inhibitor)	8.40	77.20%	69.10%	8.10%	78.90%	21.10%	0.220	6.000	31.680	3.22	0.68	0.90	21.56	3.93	0.22	3.22	98%	
SVC1 to 4**	Duratop ACW Clear W-1735HV Rev. #6 (Water-based coating/rust inhibitor)	8.40	77.20%	69.10%	8.10%	78.90%	21.10%	0.220	24.000	126.720	3.22	0.68	3.59	86.22	15.74	0.89	3.22	98%	
Totals											167.04			5.68	136.39	24.89	1.16		

Methodology

*Exempt compounds include all compounds specifically exempted from the definition of volatile organic compounds (VOC) under 40 CFR 51.100(e).

**8 The maximum material usage (gal/day) is the total for the 4 coaters.

Weight % VOC = [Weight % Volatile (water, VOC, and exempt Compounds)] - [Weight % water and exempt Compounds]

Maximum Material Usage (gal/day) = [Maximum Material Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]

Pounds of VOC per gallon coating less water and exempt Compounds = [Density (lbs/gal)] * [Weight % VOC] / [1 - (Volume % water and exempt Compounds)]

Pounds of VOC per gallon coating = [Density (lbs/gal)] * [Weight % VOC]

PTE of VOC (lbs/hour) = [Maximum Material Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [Pounds of VOC per gallon coating]

PTE of VOC (lbs/day) = [PTE of VOC (lbs/hour)] * [24 hours/day]

PTE of VOC (tons/year) = [PTE of VOC (lbs/hour)] * [8760 hours/year] * [1 ton/2000 lbs]

Uncontrolled PTE of PM10/PM2.5 (tons/year) = [Density (lbs/gal)] * [Maximum Material Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [1 - Weight % Volatile] * [1 - Transfer Efficiency] * [8760 hour/year] * [1 ton/2000 lbs]

Pounds VOC per gallon of coating solids = [Density (lbs/gal)] * [Weight % VOCs] / [Volume % Solids]

Controlled PTE of PM10/PM2.5 (tons/year) = [Uncontrolled PTE of PM10/PM2.5 (tons/year)] * [1 - Control Efficiency]

Appendix A: Emissions Calculations
Haps
From Surface Coating Operations

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
 2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

Material	Density (lbs/gal)	Maximum Material Usage (gal/unit)	Maximum Capacity (units/hour)	Weight % Dibutyl Phthalate	Weight % Triethylamine	PTE of Xylene (tons/year)	PTE of Toluene (tons/year)	
G&G RP-110 MS (rust prevention)	6.90	0.012	30.000	0.00%	0.00%	0.00	0.00	0.00
Duratop ACW Clear W-1735HV Rev. #6 (Water-based coating/rust inhibitor)	8.40	0.220	6.000	1.30%	0.12%	0.63	0.06	0.69
Duratop ACW Clear W-1735HV Rev. #6 (Water-based coating/rust inhibitor)	8.40	0.220	24.000	1.30%	0.12%	2.53	0.23	2.76
						3.16	0.29	

Methodology

PTE of HAP (tons/year) = [Density (lbs/gal)] * [Maximum Material Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [Weight % HAP] * [8760 hours/year] * [1 ton/2000 lbs]

PTE of Total HAPs (tons/year) = SUM (PTE of Each Single HAP (tons/year))

Hazardous air pollutant (HAP) is defined by Section 112(b) of the Clean Air Act.

**Appendix A: Emissions Calculations
Application of Coolant**

**Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob**

Unit ID	Materials Applied	Process	Number of Lines	Density (lb/gal)	VOC Content (% wt.)	Max. Anticipated Annual Usage (gal/yr)	VOC (TPY)	HAP Content (Diethanol amine) wt. %	Max. Single HAP (Diethanol amine) (TPY)	Total HAPs (TPY)
NCL1	2200 GT Charcool (M10) (Coolant)	Tube Mills - Cooling	1	9.2	2.34 lbs/gal	1,584	1.85	0.05%	0.004	0.004
SWL1 to 4	2200 GT Charcool (M10) (Coolant)	Tube Mills - Cooling	4	9.2	2.34 lbs/gal	6,336	7.40	0.05%	0.015	0.015

Methodology:

Potential VOC Emissions (tons/yr) = PTE Annual Usage (gal/yr) x VOC Content (lbs/gal of coolant) / 2000

Potential HAP Emissions (tons/yr) = PTE Annual Usage (gal/yr) x Density (lbs/gal) x Weight% of HAP (% wt.) / 2000

Appendix A: Emissions Calculations
Application of cleaners

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

Unit ID	Materials Applied	Process	Number of Lines	Density (lb/gal)	VOC Cont. (lb/gal)	HAP Cont. (Diethanolamine) wt. %	Max. Anticipated Annual Usage (gal/yr)	Potential Emissions		
								VOC (TPY)	Max. Single HAP (TPY)	Total HAPs (TPY)
NWL1	DART 359 (Cleaner)	Tube Mills - Washing	1	8.9	0.45	0.00%	2,640	0.59	0	0
NPCWL1	Bioclean (Cleaner)	4-Stage Clean/Prep Line for Powder Coating	1	9.1	0.10	0.00%	825	0.04	0	0
	DART 371 (Alkaline cleaner)	4-Stage Clean/Prep Line for Powder Coating	1	9.3	0.00	0.00%	4,400	0.00	0	0
	ENVIRO-BOND 7004 (corrosion resistance coating)	4-Stage Clean/Prep Line for Powder Coating	1	8.9	0.00	0.00%	4,400	0.00	0	0
	FR-960 (final sealing rinse)	4-Stage Clean/Prep Line for Powder Coating	1	8.3	0.00	0.00%	1,870	0.00	0	0
SWL1 to SWL4	DART 359 (Cleaner)	Tube Mills - Washing	4	8.9	0.45	0.00%	10,560	2.38	0	0
SPCWL1	Bioclean (Cleaner)	5-Stage Clean/Prep Line for Powder Coating	1	9.1	0.10	0.00%	825	0.04	0	0
	DART 371 (Alkaline cleaner)	5-Stage Clean/Prep Line for Powder Coating	1	9.3	0.00	0.00%	4,400	0.00	0	0
	Fastbond (corrosion resistant and lubricant)	5-Stage Clean/Prep Line for Powder Coating	1	10.1	0.00	0.00%	4,400	0.00	0	0
	FR-960 (final sealing rinse)	5-Stage Clean/Prep Line for Powder Coating	1	8.3	0.00	0.00%	1,870	0.00	0	0
Total VOC/HAP Emissions								3.05	0	0.00

Methodology:

Potential VOC Emissions (tons/yr) = PTE Annual Usage (gal/yr) x VOC Content (lbs/gal of cleaner) / 2000

Appendix A: Emissions Calculations
Natural Gas Combustion (≤ 100 MMBtu/hr)

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

	Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf 1020	Potential Throughput MMCF/yr
Dry Off Oven (NDO1)	4.00		34.4
Cure Oven (NCO1)	4.00		34.4
Boiler (NB1)	3.50		30.1
Total	11.50		98.8

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.09	0.38	0.38	0.03	4.94	0.27	4.15

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu; MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics				
	Benzene	Dichloroben zene	Formaldeh de	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.0E-04	5.9E-05	3.7E-03	8.9E-02	1.7E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.5E-05	5.4E-05	6.9E-05	1.9E-05	1.0E-04

Potential Emission of Combined HAPs (tons/yr)	9.3E-02
Potential Emission of Highest Single HAP (tons/yr)	8.9E-02

Hexane

Methodology

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.

Appendix A: Emissions Calculations
Natural Gas Combustion (≤ 100 MMBtu/hr)

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

	Heat Input Capacity	HHV	Potential Throughput
	MMBtu/hr	mmBtu mmscf	MMCF/yr
Dry Off Oven (SDO1)	1.50	1020	12.9
Cure Oven (SCO1)	2.50		21.5
Cure Oven (SCO2)	1.60		13.7
Wash Line Stage 1 Heater (SWLH1)	2.00		17.2
Total	7.60		65.3

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.06	0.25	0.25	0.02	**see below	0.18	2.74

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu; MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.4E-05	7.7E-06	4.8E-04	1.2E-02	2.2E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.2E-06	7.1E-06	9.0E-06	2.4E-06	1.4E-05

Potential Emission of Combined HAPs (tons/yr)	1.2E-02
Potential Emission of Highest Single HAP (tons/yr)	1.2E-02 Hexane

Methodology

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.

Appendix A: Emissions Calculations

Cooling Towers

Company Name: US Premier Tube Mills
 Source Location: 2855 Michigan Rd, Madison, IN 47250, and
 2971 Michigan Road, Madison, IN 47250
 Operating Permit No: 077-46805-00035
 Reviewer: Omar El-Rjoob

Parameters:

Cooling Water Density: 8.34 lb/gal
 Assumed Operating Scenario: 8,760 hr/yr
 Cooling Tower No. 1 Circulation Rate¹: 405 gal/min
 Cooling Tower No. 2 Circulation Rate¹: 405 gal/min
 Cooling Tower No. 3 Circulation Rate¹: 405 gal/min
 Max Total Dissolved Solids Concentration¹: 640 ppm
 Avg. Total Dissolved Solids Concentration¹: 320 ppm
 Drift Loss¹: 0.2 %

Unit ID	Cooling Tower	Pollutant	Circulation Rate (gal/hr)	Average TDS Concentration ¹ (ppm)	Maximum TDS Concentration ¹ (ppm)	Drift Loss ¹ (%)	Average PM Emissions	Average PM Emissions	Potential PM Emissions	Potential PM Emissions
							(lbs/hr)	(TPY)	(lbs/hr)	(TPY)
NCT1	Cooling Tower No. 1	PM/PM10/PM2.5	24,300	320	640	0.2	0.1	0.57	0.3	1.14
SCT1	Cooling Tower No. 2	PM/PM10/PM2.5	24,300	320	640	0.2	0.1	0.57	0.3	1.14
SCT2	Cooling Tower No. 3	PM/PM10/PM2.5	24,300	320	640	0.2	0.1	0.57	0.3	1.14
Total Cooling Tower PM Emissions:										3.41

Notes:

1. The parameters were taken from cooling towers on similar scales from Nucor Steel. Since cooling tower water does not come into contact with process water, pollutant emitted are assumed to be PM/PM10/PM2.5 only.

Methodology:

PM/PM10/PM2.5 Emissions = (Circulation Rate (gal/hr) x Density (lbs/gal) X TDS (ppm)/1000000) x Drift Loss (%) / 100

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: US Premier Tube Mills
Source Location: 2855 Michigan Rd, Madison, IN 47250, and
2971 Michigan Road, Madison, IN 47250
Operating Permit No: 077-46805-00035
Reviewer: Omar El-Rjoob

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Passenger Car	60.0	2.0	120.0	2.7	324.0	300	0.057	6.8	2488.6
Pickup Truck & Onsite Trailer/Tractor Vehicles	15.0	2.0	30.0	3.2	96.0	1000	0.189	5.7	2073.9
Freight Truck (5 axles)	10.0	2.0	20.0	40.0	800.0	800	0.152	3.0	1106.1
Totals			170.0		1220.0			15.5	5668.6

Average Vehicle Weight Per Trip =

7.2

 tons/trip
Average Miles Per Trip =

0.09

 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	7.2	7.2	7.2	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

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

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$

where p =

125

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

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.649	0.130	0.0319	lb/mile
Mitigated Emission Factor, Eext =	0.594	0.119	0.0291	lb/mile

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Passenger Car	0.74	0.15	0.04
Pickup Truck & Onsite Trailer/Tractor Vehicles	0.62	0.12	0.03
Freight Truck (5 axles)	0.33	0.07	0.02
Totals	1.68	0.34	0.08

Methodology

Total Weight driven per day (ton/day)
Maximum one-way distance (mi/trip)
Maximum one-way miles (miles/day)
Average Vehicle Weight Per Trip (ton/trip)
Average Miles Per Trip (miles/trip)
Unmitigated PTE (tons/yr)
Mitigated PTE (Before Control) (tons/yr)
Mitigated PTE (After Control) (tons/yr)

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

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)

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

Integral Part of the Process Determination

Source Description and Location
--

Source Name:	US Premier Tube Mills
Source Location:	2855 and 2971 Michigan Rd, Madison, IN 47250
County:	Jefferson
SIC Code:	3317 (Steel Pipes and Tubes)
Operation Permit No.:	M077-46805-00035
Permit Reviewer:	Omar El-Rjoob

“Integral Part of the Process” Determination

US Premier Tube Mills submitted the following information to justify why the primary cartridge filters should be considered an integral part of two (2) powder coating lines (NPC1 and SPC1):

- (a) One (1) manual powder coating line, identified as NPC1, approved in 2024 for construction, with a maximum capacity of 54.77 pounds of powder per hour, coating metal, using an integral primary cartridge filter as powder recovery devices and secondary filter as a particulate control, and exhausting indoors.
- (b) One (1) manual powder coating line, identified as SPC1, constructed in 2010, with a maximum capacity of 54.77 pounds of powder per hour, coating metal, using an integral primary cartridge filter as powder recovery devices and secondary filter as a particulate control, and exhausting indoors.

(1) NPC1 and SPC1 cannot operate without the primary cartridge filters

A primary cartridge filter has been installed in each of the two (2) powder coating lines (NPC1 and SPC1), even if there were no air quality regulations. The primary purpose of the primary cartridge filters is to collect and reuse powder coatings.

(2) The primary cartridge filters serves a primary purpose other than pollution control

The primary cartridge filters are integral to the powder coating lines NPC1 and SPC1 because they act as a product recovery device.

(3) The primary cartridge filters have an overwhelming positive net economic effect

The primary cartridge filters on lines NPC1 and SPC1 have a positive net economic effect by serving as recovery devices for powder coatings which can be reused and thereby reduce purchasing costs. The total cost of installation, operation, and maintenance of the cartridge filters is far less than the net savings the source receives from recovering otherwise lost powder coating material.

US Premier Tube Mills estimates cost savings from the primary cartridge filters for the powder recovery device for NPC1 at approximately \$176,811 per year.

US Premier Tube Mills estimates cost savings from the primary cartridge filters for the powder recovery device for SPC1 at approximately \$142,509 per year.

Estimates conservatively use the lowest price per pound of powder coating material and still demonstrate a significant cost benefit.

The cost analysis of the primary cartridge filters is in the attached Appendix C.

(4) Would equipment be installed if no Air Quality Regulations?

Yes, the purpose of coating filters is to collect and reuse the coating powder, which saves the company a lot of money.

Conclusion:

IDEM, OAQ evaluated the information submitted and agrees that primary cartridge filters should be considered an integral part of the two (2) powder coating lines (NPC1 and SPC1) because their main function is to recover used powder and re-used it. Therefore, the potential to emit particulates from two (2) powder coating lines (NPC1 and SPC1) was calculated after the powder coating primary filters for purposes of determining the permitting level and applicability of 326 IAC 2-2 and 326 IAC 6-3. Operating conditions in the proposed permit will specify that the primary cartridge filters shall operate at all times the two (2) powder coating lines (NPC1 and SPC1) are in operation.

The two (2) powder coating lines (NPC1 and SPC1) use a secondary filter as a particulate control, and no powder is re-used from the secondary filter, so the secondary filter is not considered an integral part of the two (2) powder coating lines (NPC1 and SPC1).

Appendix C: Integral Determination

Source Name: US Premier Tube Mills
Source Location: 2855 and 2971 Michigan Rd, Madison, IN 47250
County: Jefferson
SIC Code: 3317 (Steel Pipes and Tubes)
Operation Permit No.: M077-46805-00035
Permit Reviewer: Omar El-Rjoob

Cost analysis for the Primary cartridge filter collector for the North powder coating line (NPC1)		
Cost and Use of Powder Coating at Maximum Capacity		Units
Cost of powder coating per pound	\$1.85	\$/lb
Maximum of powder coating applied per hour	54.77	lb/hour
Transfer Efficiency	75.00%	
Pounds of overspray generated: (Maximum of powder coating applied per hour * Transfer Efficiency)	13.69	lb/hour
Savings from Re-used Powder Coating		
Reclaim efficiency of the primary cartridge filter	99.90%	
Amount of captured powder coating per hour from primary cartridge filter: (Pounds of overspray generated * Reclaim efficiency of the primary cartridge filter)	13.68	lb/hour
Amount of re-used powder coating per hour: (Amount of captured powder coating per hour from primary cartridge filter * 95% of the recovered powder is re-used)	12.99	lb/hour
Cost of re-used powder coating per hour: (Cost of powder coating per pound * Amount of re-used powder coating per hour)	\$24.04	\$/hour
NPC1 anticipated hours of operation	7488.00	hours/year
Cost of re-used powder coating per year: (Cost of re-used powder coating per hour * NPC1 anticipated hours of operation)	\$180,015.30	\$/year
Savings		
Annual maintenance and filter replacement of the primary cartridge filter	\$3,203.91	\$/year
Annual savings: (Cost of re-used powder coating per year - Annual maintenance and filter replacement of the primary cartridge filter)	\$176,811.39	\$/year

Cost analysis for the Primary cartridge filter collector for the South powder coating line (SPC1)		
Cost and Use of Powder Coating at Maximum Capacity		Units
Cost of powder coating per pound	\$1.85	\$/lb
Maximum of powder coating applied per hour	54.77	lb/hour
Transfer Efficiency	75%	
Pounds of overspray generated: (Maximum of powder coating applied per hour * Transfer Efficiency)	13.69	lb/hour
Savings from Re-used Powder Coating		
Reclaim efficiency of the primary cartridge filter	95.00%	
Amount of captured powder coating per hour from primary cartridge filter: (Pounds of overspray generated * Reclaim efficiency of the primary cartridge filter)	13.01	lb/hour
Amount of re-used powder coating per hour: (Amount of captured powder coating per hour from primary cartridge filter * 95% of the recovered powder is re-used)	12.36	lb/hour
Cost of re-used powder coating per hour: (Cost of powder coating per pound * Amount of re-used powder coating per hour)	\$22.86	\$/hour
SPC1 actual hours of operation	7488.00	hours/year
Cost of re-used powder coating per year: (Cost of re-used powder coating per hour * SPC1 actual hours of operation)	\$171,185.72	\$/year
Savings		
Annual maintenance and filter replacement of the primary cartridge filter	\$28,676.40	\$/year
Annual savings: (Cost of re-used powder coating per year - Annual maintenance and filter replacement of the primary cartridge filter)	\$142,509.32	\$/year



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

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

TO: Randy Graves
US Premier Tube Mills
2855 Michigan Rd
Madison, IN 47250

DATE: July 3, 2024

FROM: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
MSOP New Source Construction (Minor PSD/EO)
077-46805-00035

This notice is to inform you that a final decision has been issued for the air permit application referenced above.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. In addition, the Notice of Decision has been sent to the OAQ Permits Branch Interested Parties List and, if applicable, the Consultant/Agent and/or Responsible Official/Authorized Individual.

The final decision and supporting materials are available electronically; the original signature page is enclosed for your convenience. The final decision and supporting materials available electronically at:

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option **by Permit Number**, then enter permit 46805

and

IDEM's Virtual File Cabinet (VFC): <https://www.in.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

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

Final Applicant Cover Letter 8/20/20-acces via website



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 3, 2024

TO: Jefferson County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: US Premier Tube Mills
Permit Number: 077-46805-00035

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library 1/9/2017



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 3, 2024
US Premier Tube Mills
077-46805-00035

To: Interested Parties

This notice is to inform you that a final decision has been issued for the air permit application referenced above. This notice is for informational purposes only. You are not required to take any action.

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity.

The enclosed Notice of Decision Letter provides additional information about the final permit decision.

The final decision and supporting materials are available electronically at:

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option by Permit Number, then enter permit 46805

and

IDEM's Virtual File Cabinet (VFC): <https://www.in.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit.

Please Note: *If you would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@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
Final Interested Parties Cover Letter 10/13/2023

Mail Code 61-53 page 1 of 2

IDEM Staff	CMOSIER 7/3/2024 US Premier Tube Mills 077-46805-00035 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Randy Graves US Premier Tube Mills 2855 Michigan Rd Madison IN 47250 (Source CAATS) via UPS										
2		Jennifer Jones Environmental Health & Safety Manager US Premier Tube Mills 2855 Michigan Rd Madison IN 47250 (RO CAATS)										
3		Jefferson County Health Department 715 Green Rd Madison IN 47250-2143 (Health Department)										
4		Jefferson County Public Library 420 W Main St Madison IN 47250-3796 (Library)										
5		Madison City Council and Mayors Office 101 W Main St Madison IN 47250 (Local Official)										
6		Jefferson County Commissioners & Planning Board 300 E Main St Madison IN 47250 (Local Official)										
7		Madison Acquisition North LLC 3000 Michigan Road Madison IN 47250 (Affected Party)										
8		Prock Roy L Qtip Trust (Owner) PO Box 900 Plainfield IN 46168 (Affected Party)										
9		Presidential Estates Phases I (owner) 8355 Rockville road Indianapolis IN 46234 (Affected Party)										
10		MB Investments LLC 117 Holt Drive Madison IN 47250 (Affected Party)										
11		Lytle Funeral Homes & Cremation Service 117 Holt Drive Madison IN 47250 (Affected Party)										
12		Michael S & Victoria M Lundergan 2321 E SR 62 Madison IN 47250 (Affected Party)										
13		American Wildflower Salon & More 112 Holt Drive Madison IN 47250 (Affected Party)										
14		Miracle Ear Hearing Aid Center 114 Holt Drive Madison IN 47250 (Affected Party)										
15		Madison Commerical Properties LLC 740 B Clifty Drive Madison IN 47250 (Affected Party)										

Total number of pieces Listed by Sender	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 mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53 page 2 of 2

IDEM Staff	CMOSIER 7/3/2024 US Premier Tube Mills 077-46805-00035 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Super ATV 2753 Michigan Road Madison IN 47250 (Affected Party)										
2		John Hutchinson 122 W Hutchinson Lane Madison IN 47250 (Affected Party)										
3		Phil Evans The WCM Group Inc 110 S. Bender Ave Humble TX 77338 (Consultant)										
4												
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11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	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 mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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