

Mr. Louis Alexander
Madison Precision Products, Inc.
94 East 400 North
Madison, Indiana 47250

Re: 077-12227
Notice-only change to
MSOP 077-11368-00019

Dear Mr. Alexander:

Madison Precision Products, Inc. was issued a permit on February 10, 2000 for an aluminum automotive industry parts manufacturing facility. A letter notifying the Office of Air Management of changes to the permit was received on May 4, 2000. Since there will be no new construction or increase in the Potential to Emit (PTE), pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows:

- (1) Condition C.19(e) General Reporting Requirements
The source questioned that the word "parameters" was excluded from the last line of this section. Since C. 19(e) has been revised and the last line omits the reference of the word "parameters," the word does not need to be added. C.19(e) now reads (deleted language in ~~strikeout~~, add language in **bold**):

C.19 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
(e) ~~*****~~

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred ~~or failure to monitor or record the required compliance monitoring~~ is a deviation.

- (2) Condition D.1.8(a) Broken or Failed Bag Detection
The last line of this section references "Section B-Emergency Provisions." Since the source is not subject to the Emergency Provisions pursuant to the Part 70 rule, the source shall be subject to the Malfunction Provisions; therefore, the following changes have been made to the permit as follows:

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as **a malfunction** ~~an emergency~~ and the Permittee satisfies the requirements of the **malfunction emergency provisions** of this permit (**Section C-Malfunctions Report** ~~Section B-Emergency Provisions~~).
- (b) For single compartment baghouses, failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced. Operations may

continue only if the event qualifies as a **malfunction** ~~an emergency~~ and the Permittee satisfies the requirements of the **malfunction** ~~emergency~~ provisions of this permit (**Section C-Malfunctions Report** ~~Section B – Emergency Provisions~~).

- (3) Condition D.1.7 Baghouse Inspections
The source requests that the inspections apply also to the cartridge dust collectors, as well. Therefore, the following change has been made to the permit:

D.1.7 Baghouse and Cartridge Dust Collector Inspections

An inspection shall be performed each ~~calendaer~~ quarter of all bags **and cartridge dust collectors** controlling the shotblasting units. ~~All baghouse inspections~~ shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. **If the vents are not redirected, all inspections shall be performed every three months.** All defective bags **and equipment** shall be replaced **or repaired**.

- (4) Condition D.2.2 Particulate Matter (PM)
The source believes that the condition is duplicative of Section D.2.1. Upon further review, the Addendum to the original MSOP outlines that P5 and P6 were incorporated into D.2.1 pursuant to the construction permits listed. However, the construction permits were not correct in the limits that applied to P5 and P6. Therefore, Condition D.2.2 was created for P5 and P6, however, P5 and P6 were not removed from D.2.1. The following change has been made to the permit to remove the duplication:

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to CP077-5045, CP077-10083 and 326 IAC 6-3-2, the particulate matter (PM) from melting furnaces:

- (1) P1 shall not exceed 2.89 pounds per hour when operating at a process weight rate of 0.75 tons per hour.
 - (2) P2 shall not exceed 2.89 pounds per hour when operating at a process weight rate of 0.75 tons per hour.
 - (3) P3 shall not exceed 2.89 pounds per hour when operating at a process weight rate of 0.75 tons per hour.
 - (4) P4 shall not exceed 2.89 pounds per hour when operating at a process weight rate of 0.75 tons per hour.
 - ~~(5) P5 shall not exceed 0.004 pounds per hour when operating at a process weight rate of 3.0×10^{-5} tons per hour.~~
 - ~~(6) P6 shall not exceed 0.004 pounds per hour when operating at a process weight rate of 3.0×10^{-5} tons per hour.~~
 - (75) P7 shall not exceed 2.63 pounds per hour when operating at a process weight rate of 0.65 tons per hour.
 - (86) P8 shall not exceed one (1) pound per hour when operating at a process weight rate of 1.65 tons per hour.
 - (97) P9 shall not exceed one (1) pound per hour when operating at a process weight rate of 1.65 tons per hour.
 - ~~(108)~~ P10 shall not exceed 3.38 pounds per hour when operating at a process weight rate of 0.75 tons per hour
- (5) Condition C.19(a) General Reporting Requirements
The source requests that an example Semi-Annual Compliance Monitoring Report be included with the MSOP. The attached revised MSOP includes the report that the Permittee shall use for all Semi-Annual Compliance Monitoring Reports.

(6) Addendum

The source requests that the heading of the addendum be changed to reflect the Minor Source Operating Permit and not the Part 70 Operating Permit. Since the Technical Support Document or the Addendum are not physically changed, but are referenced as corrected in this letter. Therefore, the Addendum should have read:

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

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

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Kimberly Titzer, at (800) 451-6027, press 0 and ask for extension (3-8396), or dial (317) 233-8396.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

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cc: File - Jefferson County
U.S. EPA, Region V
Jefferson County Health Department
Air Compliance Section Inspector – D.J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner