

Mr. Steve Seketa
Lobdell Emery Corporation
P.O. Box 508
Greencastle, IN 46135

Re: Registered Construction and Operation Status,
133-12314-00022

Dear Mr. Seketa:

The application from Lobdell Emery Corporation, received on May 30, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following steel automobile parts production operation, to be located at 370 Manhattan, Greencastle, Indiana, is classified as registered:

- (a) One (1) stamp cutting and pressing forming production area, with a maximum steel throughput of 14,500 pounds per hour and exhausts to the atmosphere.
- (b) Welding Operations consisting of the following:
 - (1) One (1) MIG welding and machining station designated as the Banjo Welder, with a maximum wire consumption rate of 14.7 pounds per hour and exhausts to a stack designated as WE1;
 - (2) Four (4) MIG welding and machining stations designated as the Radius Arm Welder, with a maximum wire consumption rate of 14.0 pounds per hour per station exhaust to a stack designated as WE2;
 - (3) One (1) MIG welding and machining station designated as the Torsion Bar Welder, with a maximum wire consumption rate of 18.6 pounds per hour and exhausts to a stack designated as WE2;
 - (4) Two (2) MIG welding and machining stations designated as the GMX Welder, with a maximum wire consumption rate of 92.3 pounds per hour per station exhaust internally;
 - (5) Four (4) MIG welding and machining stations designated as the GMT 360 Welder, with a maximum wire consumption rate of 57.46 pounds per hour per station exhaust internally;
 - (6) One (1) MIG welding and machining station designated as the Motor Mounts Welder, with a maximum wire consumption rate of 10.6 pounds per hour and exhausts to a stack designated as WE3;
 - (7) One (1) Maintenance welding station which exhausts to the atmosphere; and
 - (8) One (1) Resistance (barrier) welding station which exhausts to one (1) stack designated as WE4.
- (c) A Degreasing and autophoretic coating system (ACS) consisting of the following:

- (1) Stage 1 through 4 consist of cleaning and rinsing and the moist air exhausts to stacks designated as EX1 through EX4. Stage 1 contains one (1) natural gas-fired boiler designated as B1, with a maximum heat input capacity of 7.6 mmBtu/hr and exhausts to a stack designated as B1. Stage 2 contains one (1) natural gas-fired boiler designated as B2, with a maximum heat input capacity of 6.28 mmBtu/hr and exhausts to a stack designated as B2.
 - (2) Two (2) non-VOC tanks designated as Tank 1 and Tank 2, storing used solvents (T1 contains used cleaner 2599 and Tank 2 contains used coating bath and rinse solution) and exhaust to stacks designated as T1 and T2.
 - (3) One (1) aqueous alkaline rust inhibitor tank designated as the lobster cooker, indirectly heated by one (1) natural gas-fired boiler designated as B3 with a maximum heat input capacity of 0.2 mmBtu/hr and exhaust to a stack designated as B3.
 - (4) Stage 5 of the ACS consist of one (1) emersion coating bath and exhausts to the atmosphere.
 - (5) Stages 6 and 7 of the ACS consist of water reaction rinsing and exhausts to the atmosphere.
 - (6) One (1) natural gas-fired drying oven, with a maximum heat input capacity of 3.5 mmBtu/hr and exhausts to one (1) stack designated as D1.
 - (7) One (1) tool and die power washer consisting of water and rinses heated by one (1) natural gas-fired boiler with a maximum heat input capacity of 0.485 mmBtu/hr designated as B6 and exhaust to a stack designated as B6.
- (d) One (1) water evaporator system consisting of the following:
- (1) Two (2) feed tanks containing various solvents such as spill cleanups and used lobster cooker solution, with a maximum storage capacity of 1500 gallons per tank.
 - (2) Two (2) water evaporators designated as North and South exhausting to stacks designated as B4 and B5.
 - (3) One (1) natural gas-fired boiler designated as B5, with a maximum heat input capacity of 0.195 mmBtu/hr and exhausts to a stack designated as B5.
 - (4) One (1) natural gas-fired boiler designated as B4, with a maximum heat input capacity of 0.395 mmBtu/hr and exhausts to a stack designated as B4.
 - (5) One (1) skimmed oil storage tank with a maximum storage capacity of 1500 gallons.
 - (6) One (1) residue concentrate storage tank with a maximum storage capacity of 1500 gallons.
- (e) One (1) maintenance oil quench tank for heat treating, with a maximum capacity of 25 gallons and exhausts to the atmosphere.
- (f) One (1) maintenance degreaser, designated as the parts washer, with a maximum capacity of 30 gallons and exhausts to the atmosphere.

- (g) Seven natural gas-fired room heaters with a total maximum heat input capacity of 8.7 mmBtu/hr and exhaust to stacks designated as H1-H7.
- (h) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 4.23 mmBtu/hr and exhausts to the atmosphere.

The following conditions shall be applicable:

1. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
 - (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
2. Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Therefore, the welding operations shall not exceed 0.551 pounds per hour per unit, based on a maximum process weight of less than 100 pounds per hour per unit.
3. Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for indirect Heating Sources), the particulate emissions from indirect heating facilities (boilers B1-B6) constructed after September 21, 1983 shall be limited by the following equation:

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

Where:

| | |
|------------------|--|
| P _t = | Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input. |
| Q = | Total source maximum operating capacity rating in million Btu per hour (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. |

4. Pursuant to 326 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility (maintenance degreaser) shall:
 - (a) equip the cleaner with a cover;
 - (b) equip the cleaner with a facility for draining cleaned parts;
 - (c) close the degreaser cover whenever parts are not being handled in the cleaner;

- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (e) provide a permanent, conspicuous label summarizing the operating requirements;
 - (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
5. Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control),
- (a) the owner or operator of a cold cleaner degreaser facility (maintenance degreaser) shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (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) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) the owner or operator of a cold cleaning facility (maintenance degreaser) shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Management that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

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

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

NLJ

cc: File - Putnam County
Putnam County Health Department
Air Compliance - Marc Goldman
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

| |
|---|
| Registration Annual Notification |
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This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3)

| | |
|-------------------------------|----------------------------------|
| Company Name: | Lobdell Emery Corporation |
| Address: | 370 Manhattan |
| City: | Greencastle |
| Authorized individual: | Steve Seketa |
| Phone #: | 765-653-9245 |
| Registration #: | 133-12314-00022 |

I hereby certify that Lobdell Emery Corporation is still in operation and is in compliance with the requirements of Registration 133-12314-00022.

| |
|----------------------|
| Name (typed): |
| Title: |
| Signature: |
| Date: |

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Lobdell Emery Corporation
Source Location: 370 Manhattan, Greencastle, IN 46135
County: Putnam
SIC Code: 3465
Operation Permit No.: 133-12314-00022
Permit Reviewer: Nysa L. James

The Office of Air Management (OAM) has reviewed an application from Lobdell Emery Corporation relating to the construction and operation of a steel automobile parts production operation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) stamp cutting and pressing forming production area, with a maximum steel throughput of 14,500 pounds per hour and exhausts to the atmosphere.
- (b) Welding Operations consisting of the following:
 - (1) One (1) MIG welding and machining station designated as the Banjo Welder, with a maximum wire consumption rate of 14.7 pounds per hour and exhausts to a stack designated as WE1;
 - (2) Four (4) MIG welding and machining stations designated as the Radius Arm Welder, with a maximum wire consumption rate of 14.0 pounds per hour per station exhaust to a stack designated as WE2;
 - (3) One (1) MIG welding and machining station designated as the Torsion Bar Welder, with a maximum wire consumption rate of 18.6 pounds per hour and exhausts to a stack designated as WE2;
 - (4) Two (2) MIG welding and machining stations designated as the GMX Welder, with a maximum wire consumption rate of 92.3 pounds per hour per station exhaust internally;
 - (5) Four (4) MIG welding and machining stations designated as the GMT 360 Welder, with a maximum wire consumption rate of 57.46 pounds per hour per station exhaust internally;
 - (6) One (1) MIG welding and machining station designated as the Motor Mounts Welder, with a maximum wire consumption rate of 10.6 pounds per hour and exhausts to a stack designated as WE3;

- (7) One (1) Maintenance welding station which exhausts to the atmosphere; and
 - (8) One (1) Resistance (barrier) welding station which exhausts to one (1) stack designated as WE4.
- (c) A Degreasing and autophoretic coating system (ACS) consisting of the following:
- (1) Stage 1 through 4 consist of cleaning and rinsing and the moist air exhausts to stacks designated as EX1 through EX4. Stage 1 contains one (1) natural gas-fired boiler designated as B1, with a maximum heat input capacity of 7.6 mmBtu/hr and exhausts to a stack designated as B1. Stage 2 contains one (1) natural gas-fired boiler designated as B2, with a maximum heat input capacity of 6.28 mmBtu/hr and exhausts to a stack designated as B2.
 - (2) Two (2) non-VOC tanks designated as Tank 1 and Tank 2, storing used solvents (T1 contains used cleaner 2599 and Tank 2 contains used coating bath and rinse solution) and exhaust to stacks designated as T1 and T2.
 - (3) One (1) aqueous alkaline rust inhibitor tank designated as the lobster cooker, indirectly heated by one (1) natural gas-fired boiler designated as B3 with a maximum heat input capacity of 0.2 mmBtu/hr and exhaust to a stack designated as B3.
 - (4) Stage 5 of the ACS consist of one (1) emersion coating bath and exhausts to the atmosphere.
 - (5) Stages 6 and 7 of the ACS consist of water reaction rinsing and exhausts to the atmosphere.
 - (6) One (1) natural gas-fired drying oven, with a maximum heat input capacity of 3.5 mmBtu/hr and exhausts to one (1) stack designated as D1.
 - (7) One (1) tool and die power washer consisting of water and rinses heated by one (1) natural gas-fired boiler with a maximum heat input capacity of 0.485 mmBtu/hr designated as B6 and exhaust to a stack designated as B6.
- (d) One (1) water evaporator system consisting of the following:
- (1) Two (2) feed tanks containing various solvents such as spill cleanups and used lobster cooker solution, with a maximum storage capacity of 1500 gallons per tank.
 - (2) Two (2) water evaporators designated as North and South exhausting to stacks designated as B4 and B5.
 - (3) One (1) natural gas-fired boiler designated as B5, with a maximum heat input capacity of 0.195 mmBtu/hr and exhausts to a stack designated as B5.
 - (4) One (1) natural gas-fired boiler designated as B4, with a maximum heat input capacity of 0.395 mmBtu/hr and exhausts to a stack designated as B4.
 - (5) One (1) skimmed oil storage tank with a maximum storage capacity of 1500 gallons.
 - (6) One (1) residue concentrate storage tank with a maximum storage capacity of 1500 gallons.
- (e) One (1) maintenance oil quench tank for heat treating, with a maximum capacity of 25 gallons and exhausts to the atmosphere.

- (f) One (1) maintenance degreaser, designated as the parts washer, with a maximum capacity of 30 gallons and exhausts to the atmosphere.
- (g) Seven natural gas-fired room heaters with a total maximum heat input capacity of 8.7 mmBtu/hr and exhaust to stacks designated as H1-H7.
- (h) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 4.23 mmBtu/hr and exhausts to the atmosphere.

Stack Summary

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (°F) |
|----------|--|---------------|-----------------|------------------|------------------|
| WE1 | Banjo Welder | 26.9 | 2.4 | TBD | TBD |
| WE2 | Radius Arm, Torsion Bar Welders | 27.3 | 2.7 | TBD | TBD |
| WE3 | Motor Mounts Welders | 30.4 | 2.7 | TBD | TBD |
| WE4 | Barrier Welder (Resistance) | 32.3 | 1.0 | TBD | TBD |
| T1 | Tank 1 - used 2599 Cleaner | 40.8 | 0.67 | Vent | 70 |
| T2 | Tank 2- Used coating bath and rinse solution | 25.4 | 0.46 | Vent | 70 |
| B1 | ACS Stage 1 boiler | 32.9 | 1.5 | 2,750 | 600 |
| B2 | ACS Stage 2 boiler | 33.0 | 1.5 | 2,260 | 600 |
| B3 | Lobster Cooker | 25.8 | 0.75 | 65 | 500 |
| B4 | North water evaporator boiler | 24.4 | 0.54 | 800 | 180 |
| B5 | South water evaporator boiler | 24.8 | 0.46 | 530 | 150 |
| B6 | Tool and die power washer | 30.0 | 1.0 | 157 | 500 |
| D1 | ACS Drying Oven | 22.1 | 1.94 | 5,000 | 220 |
| EX1 | ACS Stage 1 Process | 32.9 | 1.67 | 4,330 | 160 |
| EX2 | ACS Stage 2 Process | 34.9 | 1.67 | 4,330 | 160 |
| EX3 | ACS Stage 2 Process | 36.3 | 2.0 | 9,950 | 160 |
| EX4 | ACS Stage 1 Process | 36.4 | 2.0 | Vent | 160 |
| H1 | Room heater | 29.9 | 0.75 | 379 | 475 |
| H2 | Room heater | 28.5 | 1.17 | 253 | 475 |
| H3 | Room heater | 47.5 | 0.83 | 790 | 475 |
| H4 | Room Heater | 26.2 | 0.83 | 379 | 475 |
| H5 | Room Heater | 23.4 | 0.67 | 63 | 475 |
| H6 | Room heater | 28.8 | 0.75 | 126 | 475 |
| H7 | Room heater | 49.8 | 0.83 | 759 | 475 |

Recommendation

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

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

An application for the purposes of this review was received on May 30, 2000, with additional information received on June 29, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (fourteen (14) pages.)

The following units have no or negligible emissions:

1. Stamp cutting and pressing forming production area (no emissions);
2. Maintenance and resistance welding stations (negligible);
3. Lobster cooker (no emissions);
4. Tanks designated as Tank 1 and Tank 2 (no emissions);
5. Stages 5-7 of the ACS (no emissions);
6. Tool and die power washer (no emissions);
7. Two (2) feed tanks, one (1) skimmed oil tank and one (1) residue concentrate (negligible); and
8. Oil quench tank (no emissions).

The VOC emissions of the parts washer/degreaser is as follows:

$$0.048 \text{ gal/day} * 6.5 \text{ lb/gal} * 100\% \text{ VOC} = 0.312 \text{ lb/day}$$
$$0.312 \text{ lb/day} * 365 \text{ day/yr} * \text{ton}/2000 \text{ lb} = 0.06 \text{ ton/yr.}$$

Potential To Emit

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

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 14.2 |
| PM-10 | 14.2 |
| SO ₂ | 0.08 |
| VOC | 0.79 |
| CO | 2.91 |
| NO _x | 13.8 |

| HAP's | Potential To Emit (tons/year) |
|-----------|-------------------------------|
| Manganese | 0.77 |
| Hexane | 0.20 |
| TOTAL | 0.97 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Putnam County.

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

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Putnam County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Putnam County has been classified as attainment or unclassifiable for CO, SO₂, PM₁₀ and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

| Pollutant | Emissions (ton/yr) |
|------------------|-----------------------|
| PM | 14.2 |
| PM ₁₀ | 14.2 |
| SO ₂ | 0.08 |
| VOC | 0.79 |
| CO | 2.91 |
| NO _x | 13.8 |
| Manganese | 0.77 |
| Hexane | 0.20 |
| Combination HAPs | 0.97 |

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels) does not apply to tanks designated as T1 and T2, the two (2) feeder tanks, one (1) skimmed oil tank, residue concentrate tank and oil quench tank, because the capacity of each tank is less than 40 m³..
- (b) 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) does not apply to the boilers designated as B1-B6 because the maximum heat input capacity of each unit is less than 10 mmBtu/hr.
- (c) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (d) 40 CFR Part 63, Subpart T (Halogenated Solvent Cleaning) does not apply to the maintenance degreaser because the unit does not use any solvents that contain the compounds listed in 40 CFR Part 63.460.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Putnam and the potential to emit of NO_x, CO, SO₂, PM₁₀ and VOC is less than 100 tons per year.

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

326 IAC 5-1 (Visible Emissions Limitations):

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

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

State Rule Applicability - Welding Operations

326 IAC 2-4.1-1 (New Source Toxics Rule) does not apply to each welding unit because the potential to emit of a single HAP is less than 10 tons per year per unit and the combination HAPs is less than 25 tons per year per unit.

326 IAC 6-3-2 (Process Operations):

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Therefore, the welding operations shall not exceed 0.551 pounds per hour per unit, based on a maximum process weight of less than 100 pounds per hour per unit.

Based on the potential to emit calculations, Appendix A pages 10-14, the welding facilities are in compliance with 326 IAC 6-3-2.

No 326 IAC 8 rules apply because these units emit no VOC.

State Rule Applicability - Autophoretic Coating System

326 IAC 6-3 (Process Operations) does not apply because there are no PM emissions from this system since it is a dipping process.

326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because there are no VOC emissions from this system.

326 IAC 8-3 (Organic Solvent Degreasing operations) does not apply to the cleaning units because the solvents used do not contain any organic materials.

State Rule Applicability - Natural Gas-Fired Boilers (B1-B6)

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

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for indirect Heating Sources), the particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

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

Where: Pt = Pounds of particulate matter emitted
per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (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.

Q = 15.155 mmBtu/hr for entire source; therefore

$Pt = 1.09 / (15.155)^{0.26} = 0.5376$
lb/mmBtu.

326 IAC 7-1.1 (Sulfur Dioxide Emissions) does not apply to the boiler because the potential to emit of SO₂ is less than 25 tons per year per unit.

326 IAC 12 (New Source Performance Standards) does not apply to the boilers because 40 CFR Part 60, Subpart Dc is not applicable.

State Rule Applicability - Water Evaporator System

326 IAC 6-3 (Process operations) does not apply because there are no PM emissions from the system.

326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply to the system because the potential to emit of VOC is less than 25 tons per year.

No other 326 IAC 8 rules apply.

State Rule Applicability - Maintenance Degreaser

326 IAC 2-4.1-1 (New Source Toxics Rule) does not apply to the degreaser because the potential to emit of a single HAP is less than 10 tons per year and the combination HAPs is less than 25 tons per year.

326 IAC 6-3 (Process Operations) does not apply to the degreaser because the unit does not emit PM emissions.

326 IAC 8-1-6 (New Facilities; general reduction requirements) does not apply to the degreaser because the potential to emit of VOC is less than 25 tons per year.

326 8-3-2 (Cold Cleaner Operation):

Pursuant to 326 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operating requirements;

- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control):

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control),

- (a) the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (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) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

No other 326 IAC 8 rules apply to the degreaser.

State Rule Applicability - Storage Tanks

326 IAC 8-4-3 (Petroleum liquid storage vessels) does not apply to the skimmed oil and quench oil tanks because the capacity of each is less than 39,000 gallons.

No other 326 IAC 8 rules apply to the storage tanks listed in this permit.

State Rule Applicability - Heaters, oven and air make-up unit

326 IAC 6-3-2 (Process Operations) does not apply to the heater, oven and air make-up unit because these are combustion units and are exempt from this rule.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect) does not apply to the heaters, oven and air make-up unit because these units are not used for indirect heating.

No other 326 IAC 6 rules apply.

Conclusion

The construction and operation of this steel automobile parts production operation shall be subject to the conditions of the attached proposed New Source Construction and Minor Source Operating Permit 133-12314-00022.

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

One (1) natural gas-fired boiler

Company Name: Lobdell Emery Corporation

Address City IN Zip: 370 Manhattan, Greencastle, IN 46135

CP: 133-12314

Pit ID: 133-00022

Reviewer: NLJ

Date: 06/15/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

7.6

66.6

Pollutant

| Emission Factor in lb/MMCF | PM 11.9 | PM10 11.9 | SO2 0.6 | NOx 100.0 | VOC 5.3 | CO 21.0 |
|-------------------------------|------------|--------------|------------|--------------|------------|------------|
| Potential Emission in tons/yr | 0.40 | 0.40 | 0.02 | 3.33 | 0.18 | 0.70 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

One (1) natural gas-fired boiler

Company Name: Lobdell Emery Corporation

Address City IN Zip: 370 Manhattan, Greencastle, IN 46135

CP: 133-12314

Pit ID: 133-00022

Reviewer: NLJ

Date: 06/15/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.3

55.0

Pollutant

| | PM | PM10 | SO2 | NOx | VOC | CO |
|-------------------------------|------|------|------|-------|------|------|
| Emission Factor in lb/MMCF | 11.9 | 11.9 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.33 | 0.33 | 0.02 | 2.75 | 0.15 | 0.58 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

One (1) natural gas-fired boiler

Company Name: Lobdell Emery Corporation

Address City IN Zip: 370 Manhattan, Greencastle, IN 46135

CP: 133-12314

Pit ID: 133-00022

Reviewer: NLJ

Date: 06/15/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.2

1.8

Pollutant

| | PM | PM10 | SO2 | NOx | VOC | CO |
|-------------------------------|------|------|------|-------|------|------|
| Emission Factor in lb/MMCF | 11.9 | 11.9 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.01 | 0.01 | 0.00 | 0.09 | 0.00 | 0.02 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

One (1) natural gas-fired boiler

Company Name: Lobdell Emery Corporation

Address City IN Zip: 370 Manhattan, Greencastle, IN 46135

CP: 133-12314

Pit ID: 133-00022

Reviewer: NLJ

Date: 06/15/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.4

3.5

Pollutant

| | PM | PM10 | SO2 | NOx | VOC | CO |
|-------------------------------|------|------|------|-------|------|------|
| Emission Factor in lb/MMCF | 11.9 | 11.9 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.02 | 0.02 | 0.00 | 0.17 | 0.01 | 0.04 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

One (1) natural gas-fired boiler

Company Name: Lobdell Emery Corporation

Address City IN Zip: 370 Manhattan, Greencastle, IN 46135

CP: 133-12314

Pit ID: 133-00022

Reviewer: NLJ

Date: 06/15/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.2

1.7

Pollutant

| | PM | PM10 | SO2 | NOx | VOC | CO |
|-------------------------------|------|------|------|-------|------|------|
| Emission Factor in lb/MMCF | 11.9 | 11.9 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.01 | 0.01 | 0.00 | 0.09 | 0.00 | 0.02 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

One (1) natural gas-fired boiler

Company Name: Lobdell Emery Corporation

Address City IN Zip: 370 Manhattan, Greencastle, IN 46135

CP: 133-12314

Pit ID: 133-00022

Reviewer: NLJ

Date: 06/15/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.5

4.2

Pollutant

| | PM | PM10 | SO2 | NOx | VOC | CO |
|-------------------------------|------|------|------|-------|------|------|
| Emission Factor in lb/MMCF | 11.9 | 11.9 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.03 | 0.03 | 0.00 | 0.21 | 0.01 | 0.04 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

Seven (7) natural gas-fired heaters

Company Name: Lobdell Emery Corporation

Address City IN Zip: 370 Manhattan, Greencastle, IN 46135

CP: 133-12314

Pit ID: 133-00022

Reviewer: NLJ

Date: 06/15/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

8.7

76.2

Pollutant

| | PM | PM10 | SO2 | NOx | VOC | CO |
|-------------------------------|------|------|------|-------|------|------|
| Emission Factor in lb/MMCF | 11.9 | 11.9 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.45 | 0.45 | 0.02 | 3.81 | 0.20 | 0.80 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

One (1) natural gas-fired oven

Company Name: Lobdell Emery Corporation

Address City IN Zip: 370 Manhattan, Greencastle, IN 46135

CP: 133-12314

Pit ID: 133-00022

Reviewer: NLJ

Date: 06/15/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.5

30.7

Pollutant

| | PM | PM10 | SO2 | NOx | VOC | CO |
|-------------------------------|------|------|------|-------|------|------|
| Emission Factor in lb/MMCF | 11.9 | 11.9 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.18 | 0.18 | 0.01 | 1.53 | 0.08 | 0.32 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

One (1) natural gas-fired air make-up unit

Company Name: Lobdell Emery Corporation

Address City IN Zip: 370 Manhattan, Greencastle, IN 46135

CP: 133-12314

Pit ID: 133-00022

Reviewer: NLJ

Date: 06/15/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.2

37.1

Pollutant

| | PM | PM10 | SO2 | NOx | VOC | CO |
|-------------------------------|------|------|------|-------|------|------|
| Emission Factor in lb/MMCF | 11.9 | 11.9 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.22 | 0.22 | 0.01 | 1.85 | 0.10 | 0.39 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

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

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

Appendix A: Emissions Calculations

Company Name: Lobdell Emery Corporation
Address City IN Zip: 370 Manhattan, Greencastle, IN 46135
CP: 133-12314
Plt ID: 133-00022
Reviewer: NLJ
Date: 06/15/2000

1. From Welding Process (MIG)

| Number of Welding Stations | Maximum Throughput of Weld Wire/Metal (lbs/yr) | Maximum Wire/Metal Consumed per Station (lbs/hr) | Electrode Type | PM-10/PM 0.0051 (tons/yr) | HAP | | |
|----------------------------|--|--|----------------|---------------------------|-----------------|---------------------|-----------------|
| | | | | | Cr -- (tons/yr) | Mn 0.0003 (tons/yr) | Ni -- (tons/yr) |
| 1 | 128772 | 14.7 | ER70S-3 | 0.33 | 0.00 | 0.02 | 0.00 |
| Total | | | | 0.33 | 0.00 | 0.02 | 0.00 |

METHODOLOGY

Emission factors are from the SARA Reporting Guide where emission factors are in lb pollutant/lb electrode.

Throughput (lbs/yr) = Maximum Wire consumed per station (lbs/hr) * 8760 (hrs/yr)

Pollutant Emission (tons/yr) = Throughput (lbs/yr) * Emission factor (lbs/ lb)/2000 (lbs/ton)

Appendix A: Emissions Calculations

Company Name: Lobdell Emery Corporation
Address City IN Zip: 370 Manhattan, Greencastle, IN 46135
CP: 133-12314
Plt ID: 133-00022
Reviewer: NLJ
Date: 06/15/2000

1. From Welding Process (MIG)

| Number of Welding Stations | Maximum Throughput of Weld Wire/Metal (lbs/yr) | Maximum Wire/Metal Consumed per Station (lbs/hr) | Electrode Type | PM-10/PM 0.0051 (tons/yr) | HAP | | |
|----------------------------|--|--|----------------|---------------------------|-----------------|---------------------|-----------------|
| | | | | | Cr -- (tons/yr) | Mn 0.0003 (tons/yr) | Ni -- (tons/yr) |
| 4 | 490560 | 14 | ER70S-3 | 1.25 | 0.00 | 0.07 | 0.00 |
| Total | | | | 1.25 | 0.00 | 0.07 | 0.00 |

METHODOLOGY

Emission factors are from the SARA Reporting Guide where emission factors are in lb pollutant/lb electrode.

Throughput (lbs/yr) = Maximum Wire consumed per station (lbs/hr) * 8760 (hrs/yr)

Pollutant Emission (tons/yr) = Throughput (lbs/yr) * Emission factor (lbs/ lb)/2000 (lbs/ton)

Appendix A: Emissions Calculations

Company Name: Lobdell Emery Corporation
Address City IN Zip: 370 Manhattan, Greencastle, IN 46135
CP: 133-12314
Plt ID: 133-00022
Reviewer: NLJ
Date: 06/15/2000

1. From Welding Process (MIG)

| Number of Welding Stations | Maximum Throughput of Weld Wire/Metal (lbs/yr) | Maximum Wire/Metal Consumed per Station (lbs/hr) | Electrode Type | PM-10/PM 0.0051 (tons/yr) | HAP | | |
|----------------------------|--|--|----------------|---------------------------|-----------------|---------------------|-----------------|
| | | | | | Cr -- (tons/yr) | Mn 0.0003 (tons/yr) | Ni -- (tons/yr) |
| 2 | 1617096 | 92.3 | ER70S-3 | 4.12 | 0.00 | 0.24 | 0.00 |
| Total | | | | 4.12 | 0.00 | 0.24 | 0.00 |

METHODOLOGY

Emission factors are from the SARA Reporting Guide where emission factors are in lb pollutant/lb electrode.

Throughput (lbs/yr) = Maximum Wire consumed per station (lbs/hr) * 8760 (hrs/yr)

Pollutant Emission (tons/yr) = Throughput (lbs/yr) * Emission factor (lbs/ lb)/2000 (lbs/ton)

Appendix A: Emissions Calculations

Company Name: Lobdell Emery Corporation
Address City IN Zip: 370 Manhattan, Greencastle, IN 46135
CP: 133-12314
Plt ID: 133-00022
Reviewer: NLJ
Date: 06/15/2000

1. From Welding Process(MIG)

| Number of Welding Stations | Maximum Throughput of Weld Wire/Metal (lbs/yr) | Maximum Wire/Metal Consumed per Station (lbs/hr) | Electrode Type | PM-10/PM 0.0051 (tons/yr) | HAP | | |
|----------------------------|--|--|----------------|---------------------------|-----------------|---------------------|-----------------|
| | | | | | Cr -- (tons/yr) | Mn 0.0003 (tons/yr) | Ni -- (tons/yr) |
| 4 | 2013398.4 | 57.46 | ER70S-3 | 5.13 | 0.00 | 0.30 | 0.00 |
| Total | | | | 5.13 | 0.00 | 0.30 | 0.00 |

METHODOLOGY

Emission factors are from the SARA Reporting Guide where emission factors are in lb pollutant/lb electrode.

Throughput (lbs/yr) = Maximum Wire consumed per station (lbs/hr) * 8760 (hrs/yr)

Pollutant Emission (tons/yr) = Throughput (lbs/yr) * Emission factor (lbs/ lb)/2000 (lbs/ton)

Appendix A: Emissions Calculations

Company Name: Lobdell Emery Corporation
Address City IN Zip: 370 Manhattan, Greencastle, IN 46135
CP: 133-12314
Plt ID: 133-00022
Reviewer: NLJ
Date: 06/15/2000

1. From Welding Process (MIG)

| Number of Welding Stations | Maximum Throughput of Weld Wire/Metal (lbs/yr) | Maximum Wire/Metal Consumed per Station (lbs/hr) | Electrode Type | PM-10/PM 0.037 (tons/yr) | HAP | | |
|----------------------------|---|---|----------------|--------------------------------|-----------------------|--------------------------|-----------------------|
| | | | | | Cr -- (tons/yr) | Mn 0.003 (tons/yr) | Ni -- (tons/yr) |
| 1 | 92856 | 10.6 | Default | 1.72 | 0.00 | 0.14 | 0.00 |
| Total | | | | 1.72 | 0.00 | 0.14 | 0.00 |

METHODOLOGY

Emission factors are from the SARA Reporting Guide where emission factors are in lb pollutant/lb electrode.

Throughput (lbs/yr) = Maximum Wire consumed per station (lbs/hr) * 8760 (hrs/yr)

Pollutant Emission (tons/yr) = Throughput (lbs/yr) * Emission factor (lbs/ lb)/2000 (lbs/ton)