

Mr. Daniel O'Connor  
Keihin Indiana Precision Technology  
400 West New Road  
Greenfield, IN 46140

Re: 059-12650  
Fourth Administrative Amendment to  
FESOP 059-9160-00013

Dear Mr. O'Connor:

Keihin Indiana Precision Technology was issued a permit on May 29, 1998 for automotive components manufacturing operation. A letter requesting a correction to the type of control for the nine (9) core knockout machines was received on August 23, 2000. These facilities were permitted with baghouses as control for particulate matter. However, these facilities have always been controlled by dust collectors. Since this request involves only revisions to descriptive information only, this correction is determined to be an administrative amendment. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

1. Section A.2, Emission Units and Pollution Control Equipment Summary listed on page 5 of 39, is revised to reflect the correct type of control device of the core knockout machines (crossed out and bolded for emphasis):

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

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

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 3,238 pounds of aluminum ingots and flux per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);
- (2) Fourteen (14) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines, identified as Unit 2, with a maximum capacity of 4,731 pounds of aluminum and sand per hour, **with the sand molding machines, aluminum casting machines and the die maintenance area controlled by** using three (3) baghouses ~~as control~~, exhausting to three (3) stacks (EF-49, EF-101, and EF-107) **and with the core knockout machines controlled by nine (9) dust collectors;**
- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of 10,000 pounds of Zinc Shot per year, which exhausts inside the plant;
- (4) Mineral sprits machining and washing operations, identified as Unit 4, using one (1) Durr thermal oxidizer as control;

- (5) Machining operations, identified as Unit 5, using a mist collector as control, exhausting to one (1) stack (EF-44);
- (6) One (1) Electronic Control Unit (ECU) assembly operation, consisting of solder, resin and assembly operations, identified as Unit 6;
- (7) One (1) Electronic Control Unit (ECU) maintenance operation, consisting of cleaning and repairing operations, identified as Unit 7; and
- (8) One (1) maintenance and production cleaning operation, identified as Unit 8.

2. Section D.1, Facility Descriptions listed on page 27 of 39, is revised to reflect the correct control device of the core knockout machines (crossed out and bolded for emphasis):

(1)	Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 3,238 pounds of aluminum ingots and flux per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);
(2)	Fourteen (14) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines, identified as Unit 2, with a maximum capacity of 4,731 pounds of aluminum and sand per hour, <b>with the sand molding machines, aluminum casting machines and the die maintenance area controlled by</b> using three (3) baghouses <del>as control</del> , exhausting to three (3) stacks (EF-49, EF-101, and EF-107) <b>and with the core knockout machines controlled by nine (9) dust collectors;</b>
(3)	One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of 10,000 pounds of Zinc Shot per year, which exhausts inside the plant;

3. Condition D.1.3, Particulate Matter listed on pages 27-28 of 39, is revised to add the dust collectors as the type of control for the core knockout machines (crossed out and bolded for emphasis):

D.1.3 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

- (a) The wet scrubber for PM control shall be in operation at all times when the eight (8) aluminum furnaces (Unit 1) are in operation.
- (b) The three (3) baghouses for PM control shall be in operation at all times when the fourteen (14) shell core sand molding machines, twenty (20) aluminum casting machines, **and** one (1) die maintenance area ~~and nine (9) core knockout machines (Unit 2)~~ are in operation.
- (c) **The dust collectors for PM control shall be in operation at all times when the nine (9) core knockout machines (Unit 2) are in operation.**

4. Condition D.1.5, Parametric Monitoring listed on page 28 of 39, is revised to reflect that the core knockout machines are not controlled by the three (3) baghouses but controlled by dust collectors (crossed out and bolded for emphasis):

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the three (3) baghouses used in conjunction with the fourteen (14) shell core sand molding machines, twenty (20) aluminum casting machines, **and** one (1) die maintenance area ~~and nine (9) core knockout machines~~, at least once daily

when the fourteen (14) shell core sand molding machines, eighteen (18) aluminum casting machines, **and** one (1) die maintenance area ~~and nine (9) core knockout machines~~ are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the three (3) baghouses shall be maintained within the range of 2.0 and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

5. Condition D.1.6, Broken Bag or Failure Detection listed on page 28 of 39, is revised to add the dust collectors to the monitoring condition since the core knockout machines use this type of control instead of the baghouses (crossed out and bolded for emphasis):

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D.1.6 Broken Bag or Failure Detection

In the event that bag **and/or dust collector** failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment 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 Nysa L. James, at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

NLJ

cc: File - Hancock County  
U.S. EPA, Region V  
Hancock County Health Department  
Air Compliance Section Inspector - Warren Greiling  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**Indiana Precision Technology  
400 West New Road  
Greenfield, Indiana 46140**

(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 in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F059-9160-00013	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: May 29, 1998

First Minor Permit Modification 059-10290, issued March 22, 1999  
First Administrative Amendment 059-11071, issued July 21, 1999  
Second Administrative Amendment 059-11181, issued October 1, 1999  
Third Administrative Amendment 059-11862, issued on March 20, 2000  
First Significant Permit Revision 059-11634, issued on March 22, 2000

Fourth Administrative Amendment No.: 059-12650 Pages Affected: 5, 27 and 28	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and presented in the permit application.

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

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The Permittee owns and operates a stationary automotive components manufacturing operation.

Responsible Official: Raymond E. Lindsey  
Source Address: 400 West New Road, Greenfield, Indiana 46140  
Mailing Address: 400 West New Road, Greenfield, Indiana 46140  
SIC Code: 3714  
County Location: Hancock  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules;

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

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

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 3,238 pounds of aluminum ingots and flux per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);
- (2) Fourteen (14) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines, identified as Unit 2, with a maximum capacity of 4,731 pounds of aluminum and sand per hour, with the sand molding machines, aluminum casting machines and the die maintenance area controlled by three (3) baghouses, exhausting to three (3) stacks (EF-49, EF-101, and EF-107) and with the core knockout machines controlled by nine (9) dust collectors;
- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of 10,000 pounds of Zinc Shot per year, which exhausts inside the plant;
- (4) Mineral sprits machining and washing operations, identified as Unit 4, using one (1) Durr thermal oxidizer as control;
- (5) Machining operations, identified as Unit 5, using a mist collector as control, exhausting to one (1) stack (EF-44);
- (6) One (1) Electronic Control Unit (ECU) assembly operation, consisting of solder, resin and assembly operations, identified as Unit 6;
- (7) One (1) Electronic Control Unit (ECU) maintenance operation, consisting of cleaning and repairing operations, identified as Unit 7; and
- (8) One (1) maintenance and production cleaning operation, identified as Unit 8.

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

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 6.0 million British thermal units per hour (mmBtu/hr) natural gas fired boiler;

## SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 3,238 pounds of aluminum ingots and flux per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);
- (2) Fourteen (14) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines, identified as Unit 2, with a maximum capacity of 4,731 pounds of aluminum and sand per hour, with the sand molding machines, aluminum casting machines and the die maintenance area controlled by three (3) baghouses, exhausting to three (3) stacks (EF-49, EF-101, and EF-107) and with the core knockout machines controlled by nine (9) dust collectors;
- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of 10,000 pounds of Zinc Shot per year, which exhausts inside the plant;

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

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

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

- (a) The particulate matter (PM) emissions from the eight (8) aluminum furnaces (Unit 1) shall be limited to 4.52 pounds per hour.
- (b) The particulate matter (PM) emissions from the fourteen (14) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines (Unit 2) shall be limited to 7.30 pounds per hour, and
- (c) The particulate matter (PM) emissions from the one (1) throttle body shotblast (Unit 3) shall be limited as established in the following equation:

These limits are based on the following equation:

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

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

### Compliance Determination Requirements

#### D.1.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

#### D.1.3 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

- (a) The wet scrubber for PM control shall be in operation at all times when the eight (8) aluminum furnaces (Unit 1) are in operation.

- (b) The three (3) baghouses for PM control shall be in operation at all times when the fourteen (14) shell core sand molding machines, twenty (20) aluminum casting machines and one (1) die maintenance area are in operation.
- (c) The dust collectors for PM control shall be in operation at all times when the nine (9) core knockout machines (Unit 2) are in operation.

#### D.1.4 Visible Emissions Notations

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- (a) Daily visible emission notations of the eight (8) aluminum furnaces, fourteen (14) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines stack exhausts shall be performed once per operating day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.1.5 Parametric Monitoring

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The Permittee shall record the total static pressure drop across the three (3) baghouses used in conjunction with the fourteen (14) shell core sand molding machines, twenty (20) aluminum casting machines and one (1) die maintenance area, at least once daily when the fourteen (14) shell core sand molding machines, eighteen (18) aluminum casting machines and one (1) die maintenance area are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the three (3) baghouses shall be maintained within the range of 2.0 and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

#### D.1.6 Broken Bag or Failure Detection

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In the event that bag and/or dust collector failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.