

**NEW SOURCE CONSTRUCTION PERMIT**  
**and MINOR SOURCE OPERATING PERMIT**  
**OFFICE OF AIR QUALITY**

**ATTC Manufacturing, Inc.**  
**10455 State Road 37**  
**Tell City, Indiana 47586**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units 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 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 123-14584-00023	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 06, 2001

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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 through 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)]

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The Permittee owns and operates a stationary metal automotive parts manufacturing facility.

**Authorized Individual:** Robert Guillaume  
**Source Address:** 10455 State Road 37, Tell City, IN 47586  
**Mailing Address:** 10455 State Road 37, Tell City, IN 47586  
**Phone Number:** (812) 547-5060  
**SIC Code:** 3714  
**County Location:** Perry  
**County Status:** Attainment for all criteria pollutants  
**Source Status:** Minor Source Operating Permit  
Minor Source, under PSD

### A.2 Emissions units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Sixteen (16) cast metal milling lines each with a maximum capacity of 1,300 pounds per hour. Each of the cast metal milling lines are controlled by a dust collector. Each dust collector has an efficiency of ninety-nine (99%) percent. The dust collectors are identified as EU 1 to EU 16.
- (b) One (1) automated airless spray painting line consisting of an aqueous wash step, an automated spray painting enclosure, a natural gas-fired drying oven with a maximum heat input of 0.8 million Btu per hour, and a final forced-draft cooling step. The automated airless spray painting line has a maximum capacity of 5,400 pounds of milled metal automotive parts and 19 pounds per hour of paint.
- (c) Three (3) natural gas-fired furnaces for building heat, each with a maximum heat input capacity of 0.4 million Btu per hour.
- (d) One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of 0.25 million Btu per hour.
- (e) Two (2) natural gas-fired space heaters with a maximum heat input capacity of 0.15 million Btu per hour.
- (f) One (1) natural gas-fired space heat with a maximum heat input capacity of 0.2 million Btu per hour.

## **SECTION B GENERAL CONSTRUCTION CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

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

### **B.2 Definitions**

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

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

### **B.4 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.5 Modification to Permit [326 IAC 2]**

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Minor Source Operating Permit [326 IAC 2-6.1]**

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
  - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete 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. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

**B.7** Permit Term [326 IAC 2-6.1-7]

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This permit is issued for a fixed term of five (5) years from the original date, 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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

### C.2 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 (PMP) after issuance of this permit, including the following information on each emissions unit:
- (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;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [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 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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and 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.7 Opacity [326 IAC 5-1]**

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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:

- (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.8 Fugitive Dust Emissions [326 IAC 6-4]**

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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). 326 IAC 6-4-2(4) is not federally enforceable.

**C.9 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

**Testing Requirements**

**C.10 Performance Testing [326 IAC 3-6]**

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

### **Compliance Monitoring Requirements**

#### **C.11 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.12 Monitoring Methods [326 IAC 3]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

#### **C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**Record Keeping and Reporting Requirements**

**C.15 Malfunctions Report [326 IAC 1-6-2]**

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall 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 facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (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.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 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 Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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 and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted 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) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (d) 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.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

- (a) Sixteen (16) cast metal milling lines each with a maximum capacity of 1,300 pounds per hour. Each of the cast metal milling lines are controlled by a dust collector. Each dust collector has an efficiency of ninety-nine (99%) percent. The dust collectors are identified as EU 1 to EU16.

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

### Emission Limitations and Standards

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the cast metal milling lines shall not exceed 3.1 pounds per hour when operating at a process weight rate of 1,300 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 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 [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]

#### D.1.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

The dust collectors for PM control shall be in operation at all times when the cast metal milling lines are in operation.

## SECTION D.2

## EMISSIONS UNIT OPERATION CONDITIONS

- (b) One (1) automated airless spray painting line consisting of an aqueous wash step, an automated spray painting enclosure, a natural gas-fired drying oven with a maximum heat input of 0.8 million Btu per hour, and a final forced-draft cooling step. The automated airless spray painting line has a maximum capacity of 5,400 pounds of milled metal automotive parts and 19 pounds per hour of paint.

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

### Emission Limitations and Standards

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the automated airless spray painting line shall not exceed the pound per hour emission rate established as E in the following formula:

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.2.2 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]

Actual emissions before add-on control of VOC from the automated airless spray painting line are less than 15 pounds per day. Therefore, 326 IAC 8-2-9 will not apply. Any change or modification which may increase the actual emissions before add-on control to 15 pounds per day or more of volatile organic compounds must be approved by the Office of Air Quality before any such change may occur.

#### D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 1-6-3]

Potential to emit of HAPs from the automated airless spray painting line are less than 10 tons per year of any single HAP and less than 25 tons per year of a combination of HAPs. Any change or modification which may increase the potential emissions of a single HAP to greater than 10 tons per year or a combination of HAPs to greater than 25 tons per year must be approved by OAQ before such change may occur.

#### D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

### Compliance Determination Requirements

#### D.2.5 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.6 Particulate Matter (PM)

The water curtain for PM control shall be in operation at all times when the automated airless spray painting line is in operation.

## **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

### **D.2.7 Monitoring**

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- (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify the placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

### **D.2.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.6 and D.2.7, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Conditions D.2.2 and D.2.3.
  - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The cleanup solvent usage for each month;
  - (3) The total VOC and HAP usage for each month; and
  - (4) The weight of VOCs and HAPs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.3**

**EMISSIONS UNIT OPERATION CONDITIONS**

- (c) Three (3) natural gas-fired furnaces for building heat, each with a maximum heat input capacity of 0.4 million Btu per hour.
- (d) One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of 0.25 million Btu per hour.
- (e) Two (2) natural gas-fired space heaters with a maximum heat input capacity of 0.15 million Btu per hour.
- (f) One (1) natural gas-fired space heat with a maximum heat input capacity of 0.2 million Btu per hour.

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

There are no specifically applicable rules or requirements for this unit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance 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).

<b>Company Name:</b>	ATTC Manufacturing, Inc.
<b>Address:</b>	10455 State Road 37
<b>City:</b>	Tell City, IN 47586
<b>Phone #:</b>	(812) 547-5060
<b>MSOP #:</b>	123-14584-00023

I hereby certify that ATTC Manufacturing, Inc. is  still in operation.  
 no longer in operation.

I hereby certify that ATTC Manufacturing, Inc. is  in compliance with the requirements of MSOP 123-14584-00023.  
 not in compliance with the requirements of MSOP 123-14584-00023.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-5967

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

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 ?\_\_\_\_\_, 100TONS/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(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 and to qualify for the exemption under 326 IAC 1-6-4.**

**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:

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**November 6, 2001**

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

**Addendum to the Technical Support Document  
for Minor Source Operating Permit (MSOP)**

**Source Background and Description**

**Source Name:** ATTC Manufacturing, Inc.  
**Source Location:** 10455 State Road 37, Tell City, IN 47586  
**County:** Perry  
**SIC Code:** 3714  
**Operation Permit No.:** 123-14584-00023  
**Permit Reviewer:** ERG/AR

On September 20, 2001, the Office of Air Quality (OAQ) had a notice published in the Perry County News, Rockville, Indiana, stating that ATTC Manufacturing, Inc. had applied for a Minor Source Operating Permit (MSOP) to operate a metal automotive parts manufacturing facility with control. The notice also stated that OAQ proposed to issue a permit 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.

On October 17, 2001, ATTC Manufacturing, Inc. submitted comments on the proposed MSOP. The summary of the comments is as follows:

**Comment #1:**

The source mentioned that they will need more building heat than they originally applied for. They will need to add the following units:

Four (4) natural gas-fired furnaces for building heat, three (3) with a maximum heat input capacity of 0.4 million Btu per hour, and one (1) with a maximum heat input capacity of 0.25 million Btu per hour.

Three (3) natural gas-fired space heaters, two (2) with a maximum heat input capacity of 0.15 million Btu per hour, and one (1) with a maximum heat input capacity of 0.2 million Btu per hour.

**Response to Comment 1:**

Since these additions will not affect the permit level, IDEM, OAQ has added them to the permit. The following changes have been made.

**A.2 Emissions units and Pollution Control Equipment Summary**

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Sixteen (16) cast metal milling lines each with a maximum capacity of 1,300 pounds per hour. Each of the cast metal milling lines are controlled by a dust collector. Each dust

collector has an efficiency of ninety-nine (99%) percent. The dust collectors are identified as EU 1 to EU 16.

- (b) One (1) automated airless spray painting line consisting of an aqueous wash step, an automated spray painting enclosure, a natural gas-fired drying oven with a maximum heat input of 0.8 million Btu per hour, and a final forced-draft cooling step. The automated airless spray painting line has a maximum capacity of 5,400 pounds of milled metal automotive parts and 19 pounds per hour of paint.
- (c) **Three (3) ~~One (1)~~ natural gas-fired furnaces for building heat, each with a maximum heat input capacity of 0.4 million Btu per hour.**
- (d) **One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of 0.25 million Btu per hour.**
- (e) **Two (2) natural gas-fired space heaters with a maximum heat input capacity of 0.15 million Btu per hour.**
- (f) **One (1) natural gas-fired space heat with a maximum heat input capacity of 0.2 million Btu per hour.**

#### SECTION D.3

#### EMISSIONS UNIT OPERATION CONDITIONS

- (c) **Three (3) ~~One (1)~~ natural gas-fired furnaces for building heat, each with a maximum heat input capacity of 0.4 million Btu per hour.**
- (d) **One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of 0.25 million Btu per hour.**
- (e) **Two (2) natural gas-fired space heaters with a maximum heat input capacity of 0.15 million Btu per hour.**
- (f) **One (1) natural gas-fired space heat with a maximum heat input capacity of 0.2 million Btu per hour.**

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

#### Comment #2:

The source pointed out that in Appendix A of the TSD, the title of the emissions calculations for glycol ether emissions says "Particulate Matter" from cast metal milling lines." The source would like this changed.

#### Response to Comment 2:

The OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the TSD. This accomplished the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Please note that the title of the glycol ether emissions calculation is changed to read "Glycol Ether from the Painting Line."

#### Comment 3:

The source has decided that they want to control the overspray from the painting machine with a water curtain instead of dry filters. They would like all conditions pertaining to the dry filters to be deleted from the permit.

### Response to Comment 3:

Since the dry filters will not be installed, all reference to them in the permit was deleted. Compliance Determination and Compliance Monitoring Requirements for water curtains were added to the permit.

### Compliance Determination Requirements

#### D.2.5 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.6 Particulate Matter (PM)

The water curtain ~~dry filters~~ for PM control shall be in operation at all times when the automated airless spray painting line is in operation.

### Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]

#### D.2.7 Monitoring

- (a) **Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify the placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.** ~~Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

Upon further review, IDEM, OAQ made the following changes to the permit:

1. Condition C.3 says "should" when it should say "shall." This was corrected.

#### C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [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 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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application ~~shall~~ should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

2. The compliance monitoring plan condition was inadvertently left out of the permit. IDEM, OAQ added this condition.

**C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]**

- (a) **The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:**
  - (1) **This condition;**
  - (2) **The Compliance Determination Requirements in Section D of this permit;**
  - (3) **The Compliance Monitoring Requirements in Section D of this permit;**
  - (4) **The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and**
  - (5) **A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ (and local agency when applicable) upon request and shall be subject to review and approval by IDEM, OAQ, (and local agency when applicable). The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :**
    - (A) **Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and**
    - (B) **A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.**
- (b) **For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.**
- (c) **After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:**

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.**
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;**
  - (3) An automatic measurement was taken when the process was not operating;  
or**
  - (4) The process has already returned to operating within “normal” parameters and no response steps are required.**
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.**

**C.1413** ~~Actions~~ 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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

November 6, 2001

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

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

**Source Background and Description**

Source Name: ATTC Manufacturing, Inc.  
Source Location: 10455 State Road 37, Tell City, IN 47586  
County: Perry  
SIC Code: 3714  
Operation Permit No.: 123-14584-00023  
Permit Reviewer: ERG/AR

The Office of Air Quality (OAQ) has reviewed an application from ATTC Manufacturing, Inc. relating to the construction and operation of a metal automotive parts manufacturing facility.

**Permitted Emission Units and Pollution Control Equipment**

There are no permitted facilities operating at this source during this review process.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

**New Emission Units and Pollution Control Equipment Receiving Prior Approval**

- (a) Sixteen (16) cast metal milling lines each with a maximum capacity of 1,300 pounds per hour. Each of the cast metal milling lines are controlled by a dust collector. Each dust collector has an efficiency of ninety-nine (99%) percent. The dust collectors are identified as EU 1 to EU 16.
- (b) One (1) automated airless spray painting line consisting of an aqueous wash step, an automated spray painting enclosure, a natural gas-fired drying oven with a maximum heat input of 0.8 million Btu per hour, and a final forced-draft cooling step. The automated airless spray painting line has a maximum capacity of 5,400 pounds of milled metal automotive parts and 19 pounds per hour of paint.
- (c) One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of 0.4 million Btu per hour.

**Existing Approvals**

There are no existing approvals, this is the first air permit for the source.

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Temperature (°F)	Flow Rate (acfm)
S1 to 16	EU 1 to 16 Dust Collectors #1 to 16	35	1 x 1.67	Ambient	4000
S 17	EU 17 Painting line/Auto washing machine	N/A	N/A	N/A	N/A
S 18	EU 17 Painting line/Auto painting machine	35	0.83	Ambient	3000
S 19	EU17 Painting line/Auto drying oven	N/A	N/A	N/A	N/A
S 20	EU 17 Painting line/Auto cooling equipment	N/A	N/A	N/A	N/A
S 21	Building furnace	N/A	N/A	N/A	N/A

**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 June 25, 2001, with additional information received on August 15<sup>th</sup> and August 30<sup>th</sup>.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 through 6).

**Potential To Emit of Source Before Controls**

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	38.1
PM-10	38.1
SO <sub>2</sub>	—
VOC	1.6
CO	—
NO <sub>x</sub>	0.5

HAP's	Potential To Emit (tons/year)
Glycol Ethers	1.5
TOTAL	1.5

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of 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 pollutants are greater than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1.
- (c) 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/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (d) This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

**County Attainment Status**

The source is located in Perry County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Perry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Perry County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

**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	1.7
PM10	1.7
SO <sub>2</sub>	—
VOC	1.6
CO	—
NO <sub>x</sub>	0.5
Single HAP	1.5
Combination HAPs	1.5

- (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) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart MM) because this is not an automobile assembly plant.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

### **State Rule Applicability - Entire Source**

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Perry County and the potential to emit NO<sub>x</sub>, CO, VOC, SO<sub>x</sub>, and PM10 is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 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 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%) 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 - Individual Facilities**

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

The operation of this metal automotive parts manufacturing facility will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

This source does not have potential VOC emissions equal to or greater than twenty five (25) tons per year, therefore this source is not subject to the provisions of 326 IAC 8-1-6.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

This source does not coat automobiles and light duty trucks, they coat metal automotive parts therefore, 326 IAC 8-2-2 does not apply.

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

This source was built after July 1, 1990 and does not have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls therefore, 326 IAC 8-2-9 does not apply.

326 IAC 6-3-2 (Process Operations)

The allowable particulate matter (PM) emission rate from each of the cast metal milling lines shall not exceed 3.1 pounds per hour when operating at a process weight rate of 1,300 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

The dust collectors shall be in operation at all times the cast metal milling lines are in operation, in order to comply with this limit.

326 IAC 6-3-2 (Process Operations)

The PM from the automated airless spray painting line shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

The dry filters shall be in operation at all times the automated airless spray painting line is in operation, in order to comply with this limit.

## Conclusion

The construction and operation of this metal automotive parts manufacturing facility shall be subject to the conditions of the attached New Source Construction and Minor Source Operating Permit 123-14584-00023.

Appendix A: Emissions Calculations

Particulate Matter From Cast Metal Milling Lines

Company Name: ATTC Manufacturing, Inc  
Address City IN Zip: 10455 State Road 37, Tell City, Indiana 47586  
CP: 123-14584-00023  
Plt ID: 123-00023  
Reviewer: ERG/AR  
Date: July 24, 2001

880 pounds of dust collected per month total at Aisin (sister company where the milling lines are being moved from)

There are 10 lines at Aisin.

So, (880 pounds of dust collected per month)/(10 milling lines) = 88 pounds of dust collected per month per milling line

ATTC has 16 milling lines:

(88 pounds of dust collected per month per milling line)\*(16 milling lines) = 1408 pounds of dust collected per month at ATTC

**Convert to tons of dust**

**collected per year** = (1408 pounds of dust collected per month at ATTC)\*(12 months per year)\*(1 ton per 2000 pounds)  
= 8.4 tons/yr  
= (8.4 tons/yr)/99% control efficiency  
= **8.5 tons/yr**

Aisin operates approximately 7000 hours per year, so this number has to be scaled up to 8760 hours per year

**Tons of dust collected  
per year assuming 8760**

**hours of operation** = (8.5 tons/yr)\*(8760 hours per year/7000 hours per year) = **11 tons per year**

**Control emissions using  
a dust collector with 99%**

**efficiency =** (11 tons/year)\*(0.01) = **0.11 tons per year**

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

**Company Name:** ATTC Manufacturing, Inc  
**Address City IN Zip:** 10455 State Road 37, Tell City, Indiana 47586  
**CP:** 123-14584-00023  
**Pit ID:** 123-00023  
**Reviewer:** ERG/AR  
**Date:** July 24, 2001

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
W44231 - Autoprime	11.4	45.02%	43.1%	1.9%	59.0%	61.74%	0.00320	514.000	0.54	0.22	0.36	8.69	1.59	27.09	0.36	40%

**State Potential Emissions**

**Add worst case coating to all solvents**

**0.36                      8.69                      1.59                      27.09**

using a dust collector with  
94% efficiency =

$(27.09 \text{ tons/year}) \times (0.06) = 1.6 \text{ tons per year}$

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Total = Worst Coating + Sum of all solvents used  
 Transfer Efficiency is for a airless spray which was taken from Binks, High Volume Low Pressure Spraying publication.

Appendix A: Emissions Calculations  
Glycol Ether from the Painting Line

Company Name: ATTC Manufacturing, Inc  
Address City IN Zip: 10455 State Road 37, Tell City, Indiana 47586  
CP: 123-14584-00023  
Plt ID: 123-00023  
Reviewer: ERG/AR  
Date: July 24, 2001

Maximum Rate of Paint Used =	19 lbs/hr
Weight Percent of Glycol Ethers =	1.76 %

<b>Glycol Ethers Emissions =</b>	<b>1.46 tons/yr</b>
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Methodology:

$(19 \text{ lbs of paint/hr}) \times (.0176 \text{ lb of glycol ethers/lb of paint}) \times (1 \text{ ton}/2000 \text{ lbs}) \times (8760 \text{ hr}/1 \text{ yr})$

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Emissions for the Drying Oven and Building Furnace**

**Company Name: ATTC Manufacturing, Inc**  
**Address City IN Zip: 10455 State Road 37, Tell City, Indiana 47586**  
**CP: 123-14584-00023**  
**Plt ID: 123-00023**  
**Reviewer: ERG/AR**  
**Date: August 30, 2001**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

1.2

10.4

**Pollutant**

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.5	0.0	0.4

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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 (SUPPLEMENT D 3/98)

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

**MM BTU/HR <100**

**Emissions for the Drying Oven and Building Furnace**

**HAPs Emissions**

**Company Name:** ATTC Manufacturing, Inc  
**Address City IN Zip:** 10455 State Road 37, Tell City, Indiana 47586  
**CP:** 123-14584-00023  
**Plt ID:** 123-00023  
**Reviewer:** ERG/AR  
**Date:** August 30, 2001

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.095E-05	6.255E-06	3.909E-04	9.382E-03	1.772E-05

9.808E-03

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.606E-06	5.733E-06	7.297E-06	1.981E-06	1.095E-05

2.856E-05

Methodology is the same as previous page.

**Total HAPs = 9.836E-03 tons/year**

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

Summary of Emissions

Company Name: ATTC Manufacturing, Inc  
 Address City IN Zip: 10455 State Road 37, Tell City, Indiana 47586  
 CP: 123-14584-00023  
 Plt ID: 123-00023  
 Reviewer: ERG/AR  
 Date: July 24, 2001

Tons/Year	PM	PM <sub>10</sub>	SO <sub>2</sub>	No <sub>x</sub>	CO	VOC	HAPs
<b>16 Milling Lines</b>	11	11	0	0	0	0	0
<b>Paint</b>	0	0	0	0	0	0	1.5
<b>Spray Painting Line</b>	27.1	27.1	0	0	0	1.6	0.0
<b>Drying Oven &amp; Furnace</b>	0	0	0	0.5	0	0	0.0098
<b>Total</b>	<b>38.1</b>	<b>38.1</b>	<b>0.0</b>	<b>0.5</b>	<b>0.0</b>	<b>1.6</b>	<b>1.5</b>

