

November 4, 2002

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

Re: Registered Construction and Operation Status,
133-15318-00022

Dear Mr. Seketa:

The application from Lobdell Emery Corporation, received on February 26, 2002 with additional information received on April 1, 2002; August 2, 2002 and October , 2002 has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following automobile steel parts production plant, located at 370 Manhattan, Greencastle, Indiana, is classified as registered:

New Emission Units and Pollution Control Equipment

- (a) One (1) MIG welding station designated as the GMT 357 Twist Axle, with a maximum wire consumption rate of 208.6 pounds per hour and exhausts inside the building;
- (b) Hand held welder with a maximum wire consumption rate of 1.0 pounds per hour; and
- (c) One (1) table-top sandblaster with a maximum consumption of 3.33 pounds of sand per hour or 560.64 pounds of sand per year, with dust collector used to recycle the media.

Permitted Emission Units and Pollution Control Equipment

- (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) Four (4) MIG welding and machining stations designated as the Radius Arm Welder, with a permitted maximum wire consumption rate of 14.0 pounds per hour per station exhaust to a stack designated as WE2. The maximum wire consumption will be increase to 120.8 pounds per hour;
 - (2) One (1) MIG welding and machining stations designated as the Torsion Bar Welder, with a permitted maximum wire consumption rate of 18.6 pounds per hour and exhausts to a stack designated as WE2. The maximum wire consumption will be increase to 41.7 pounds per hour;
 - (3) Two (2) MIG welding and machining stations designated as the GMX Welder, with a permitted maximum wire consumption rate of 92.3 pounds per hour per station exhaust internally. The new maximum consumption rate is 35.6 pounds per hour;

- (4) 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. The maximum wire consumption will be increase to 522 pounds per hour;
 - (5) One (1) MIG welding and machining station designated as the Motor Mounts Welder, with a permitted maximum wire consumption rate of 10.6 pounds per hour and exhausts to a stack designated as WE3. The maximum wire consumption will be increase to 16.8 pounds per hour;
 - (6) One (1) Maintenance Welding Station which exhausts to the atmosphere; and
 - (7) One (1) Resistance (barrier) Welding Station which exhausts to one (1) stack designated as WE4.
- (c) A Degreasing and Autophoretic Coating Systems (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 het 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 ton 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:
 - (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 15 minutes (60 readings) in a 6-hour period 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 the Particulate emissions from the following operations shall be limited as follows:

OPERATION	PROCESS WEIGHT RATE (tons/hour)	PARTICULATE EMISSION LIMIT (pounds/hour)
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New MIG Weld Station, GMT 357 Twist Axle	2.46	7.48
New Hand Welders	3.75	9.9
Radius Arm Welder	0.49	2.57
GMT 360 Welder	4.23	10.7
Torsion Bar Welder	0.53	2.67
GMX Welder	0.34	1.97
Motor Mounts Welder	0.34	1.97

The Particulate emission limits shall be determined using 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:

$$E = 4.10 P^{0.67}$$

where E = rate of Particulate emission in pounds per hour; and

P = process weight rate in tons per hour

3. Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the following boilers shall be limited as follows:

Boilers ID	Heat Input Capacity (mmBtu/hr)	PM Limit (lb/mmBtu)
B1	7.6	0.5376
B2	6.28	0.5376
B3	0.2	0.5376
B4	0.395	0.5376
B5	0.195	0.5376
B6	0.485	0.5376

The above PM Limits shall be determined using the following equation:

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

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 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 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaner degreaser (Maintenance Degreaser) shall:
 - (a) Equip the cleaner with a cover;
 - (b) Equip the cleaner with a emissions unit 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 operation requirements;
 - (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter 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(a) (Cold Cleaner Degreaser Operation and Control)
 - (a) the owner or operator of the cold cleaner degreaser (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 (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a emissions unit 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 (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage emissions unit must be internal such that articles are enclosed under the cover while draining. The drainage emissions unit 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 (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is 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) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaning emissions unit (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.
6. Any change or modification which may increase the potential to emit (PTE) to 25 tons per year or more from the equipment covered in this registration must be approved by the Office of Air Quality (OAQ) before such change may occur.

This registration is a revised registration, involving new construction 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 Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
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 Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

APD

cc: File - Putnam County
Putnam County Health Department
Air Compliance - Jim Thorpe
Permit Tracking
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Lobdell Emery Corporation
Address:	370 Manhattan
City:	Greencastle
Authorized individual:	Steve Seketa
Phone #:	(765) 659-2400
Registration #:	133-15318-00022

I hereby certify that **Lobdell Emery Corporation** is still in operation and is in compliance with the requirements of Registration **133-15318-00022**.

Name (typed):
Title:
Signature:
Date: