INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: January 19, 2006

RE: Keihin IPT Manufacturing, Inc. / 059-16006-00013

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 1/10/05

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100 North Senate Avenue
Indianapolis, Indiana 46204-2251
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(800) 451-6027
www.IN.gov/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Keihin IPT Manufacturing, Inc.
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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 2-7 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.: T059-16006-00013	
Issued by: Origin signed by Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date:January 19, 2006 Expiration Date:January 19, 2011

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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.3 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary electronic fuel injection system for an automotive components manufacturing plant.

Responsible Official:	Assistant Vice President
Source Address:	400 West New Road, Greenfield, Indiana 46140
Mailing Address:	400 West New Road, Greenfield, Indiana 46140
General Source Phone Number:	(317) 462-3015
SIC Code:	3714
County Location:	Hancock
Source Location Status:	Nonattainment for Ozone under the 8-hour standard Attainment for ozone under the 1-hour standard and for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Minor Source under Emission Offset Major Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Aluminum furnaces consisting of:

(1) Seven (7) aluminum melt furnaces, (identified as Unit 1-A and Unit 1-B), processing aluminum ingots and flux, using a wet scrubber as control and exhausting at stack EF-48. Two (2) furnaces (Unit 1-A) each have a maximum throughput capacity of 2,500 pounds per hour; and five (5) furnaces (Unit 1-B) each have a maximum throughput capacity of 1,100 pounds per hour. These units were constructed between 1989 and 1995.

(2) One (1) aluminum melt furnace (identified as HPDC furnace # 3), with a maximum throughput capacity of 1,100 pounds of aluminum ingots and flux per hour, controlled by a baghouse and exhausting at stack EF-120. This unit was constructed in 1991.

(3) Two (2) reverberatory furnaces (identified as melt furnace Unit 9 and Unit 10), each with a maximum throughput rate of 1,500 pounds of aluminum ingots and flux per hour, using natural gas as fuel, each with a maximum heat capacity of 1.265 MMBtu per hour, controlled by a baghouse 4, and exhausting at stack EF-120. These units were constructed in 2003.

(b) Unit 2 Aluminum facilities, constructed in 1988 and consisting of:

(1) Eleven (11) shell core machines, each with a maximum sand throughput of 228 pounds per hour;

(2) Sixteen (16) die-casting machines, each with a maximum metal and sand throughput of 594 and 157 pounds per hour respectively; and

(3) Nine (9) core knockout machines each with a maximum metal and sand throughput of 975 and 258 pounds per hour respectively.

The shell core machines and die-casting machines are controlled by three (3) baghouses and exhaust at stacks EF-49, EF-101, and EF-107. The nine (9) core knockout machines are controlled by nine (9) dust collectors.

(c) Four (4) aluminum die-casting machines (identified as UBE # 1 through 4), each with a maximum metal and sand throughput of 594 and 157 pounds per hour respectively, controlled by a baghouse and exhausting at stack EF-120. This unit was constructed in 1988.

(d) Machining and washing processes (identified as Unit 4), consisting of injector component machines with a maximum usage rate of 1.35 gallons of mineral spirits per hour, and using one (1) Durr thermal oxidizer as control. This facility was installed in 1989.

(e) Two (2) natural gas-fired Cleaver Brooks boilers (identified as B-1 and B-2), each with a maximum heat input capacity of 10.46 MMBtu per hour and exhausting at stacks B-1 and B-2. Boiler B-1 was installed in 1989 and boiler B-2 was installed in 1999.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

(a) Degreasing operations using an aqueous based cleaner with a maximum usage rate of 145 gallons per year and that is not subject to 326 IAC 20-6. This unit was constructed in 1989 [326 IAC 8-3-2].

(b) One (1) shot blasting unit (identified as Unit 3) with a maximum throughput rate of 2,833 pounds of zinc shot per month. This unit was installed in 1990 [326 IAC 6-3].

(c) One (1) shot blasting unit (identified as Unit 5), with a maximum throughput rate of 1,000 pounds of glass beads per month. This unit was installed in 2003 [326 IAC 6-3].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)][IC 13-15-6(a)]

(a) This permit, T059-16006-00013, is issued for a fixed term of five (5) years from the issuance date of this permit, 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 date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report 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 annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [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 (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s), by job title, 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; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for the unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a deviation from 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in

compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T059-16006-00013 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Indianapolis, Indiana 46204-2551

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives,

marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emissions trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of the permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no

other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

B.25 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) The condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) The emission unit to which the condition pertains permanently ceases operation.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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.6 Stack Height [326 IAC 1-7]

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.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or

before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) 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 Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Other Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(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.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emissions statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emission of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-1.1-1.

(b) The emission statement 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this Permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

(c) 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.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) 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. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Aluminum furnaces consisting of:

(1) Seven (7) aluminum melt furnaces, (identified as Unit 1-A and Unit 1-B), processing aluminum ingots and flux, using a wet scrubber as control and exhausting at stack EF-48. Two (2) furnaces (Unit 1-A) each have a maximum throughput capacity of 2,500 pounds per hour; and five (5) furnaces (Unit 1-B) each have a maximum throughput capacity of 1,100 pounds per hour. These units were constructed between 1989 and 1995.

(2) One (1) aluminum melt furnace (identified as HPDC furnace # 3), with a maximum throughput capacity of 1,100 pounds of aluminum ingots and flux per hour, controlled by a baghouse and exhausting at stack EF-120. This unit was constructed in 1991.

(3) Two (2) reverberatory furnaces (identified as melt furnace Unit 9 and Unit 10), each with a maximum throughput rate of 1,500 pounds of aluminum ingots and flux per hour, using natural gas as fuel, each with a maximum heat capacity of 1.265 MMBtu per hour, controlled by a baghouse 4, and exhausting at stack EF-120. These units were constructed in 2003.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate [326 IAC 2-2 (PSD)]

Pursuant to 326 IAC 2-2, the PM and PM10 emissions from each of the two (2) furnaces (Unit 1-A) shall not exceed 5.6 and 3.24 pounds per hour, respectively. These limits are equivalent to 23.5 tons of PM per year and 14.2 tons of PM10 per year, from each furnace (Unit 1-A).

Compliance with these limits makes the source minor for 326 IAC 2-2 (PSD).

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes):

(a) The particulate emissions from each of the six (6) aluminum furnaces (Unit 1-B and HPDC furnace #3) shall not exceed 2.75 pounds per hour when operating at a process weight rate of 1,100 pounds per hour.

(b) The particulate emissions from each of the two (2) aluminum furnaces (Unit 1-A) shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

(c) The particulate emissions from each of the reverberatory furnaces (Unit 9 and Unit 10) shall be limited to 3.38 pounds per hour when operating at a process weight rate of 1,500 pounds per hour.

These limits are based on the following equation:

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:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

D.1.3 Aluminum Processing Requirements [40 CFR 63.1500, Subpart RRR]

Pursuant to Second Minor Permit Revision 059-14848-00013 issued on November 8, 2001, the metal processed at the ten (10) aluminum furnaces (identified as Unit 1-A, Unit 1-B, HPDC furnace #3, Unit 9, and Unit 10) shall be clean aluminum only, where clean aluminum is defined as given below:

(a) molten aluminum,

(b) T-bar,

(c) sow,

(d) ingot,

(e) billet,

(f) pig,

(g) alloying elements,

(h) thermally dried aluminum chips,

(i) aluminum scrap dried at 650 degree Fahrenheit or higher,

(j) aluminum scrap delacquered/decoated at 900EF or higher,

(k) other gates and risers,

(l) aluminum scrap, shapes, and products, and

(m) scrap material generated on-site by aluminum extruding, rolling, scalping, forging, forming/stamping, cutting, and trimming operations, dried at 650EF or higher or equivalent non-thermal drying process, that are oil- and lubricant-free, unpainted/uncoated, and have no undergone any processes that would cause contamination of the aluminum.

Compliance with these requirements render 40 CFR 63.1500, Subpart RRRR not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A preventive maintenance plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for the two (2) furnaces (Unit 1-A) and control devices.

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

To comply with Condition D.1.1, or except as otherwise provided by statute, rule, or this permit the wet scrubber for PM control shall be in operation and control emissions at all times when any of the two (2) furnaces (Unit 1-A) are in operation.

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) Between 30 and 36 months after the issuance of this permit and to document compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM10 testing on the one (1) wet scrubber controlling PM and PM10 emissions from the 2,500 pounds per hour furnace (identified as Unit 1-A). Stack testing shall be performed when fluxing. The stack tests shall be completed using methods as approved by the Commissioner. These stack tests shall be repeated at least once every five (5) years from the date of the last valid

compliance demonstration. PM includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Visible Emissions Notations

(a) Once per day visible emission notations of the stack exhaust for two (2) aluminum melt furnaces (Unit 1-A) shall be performed during normal daylight operations when fluxing. A trained employee shall record whether the 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) If abnormal emissions are observed, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.8 Monitoring of Scrubber Operational Parameters

(a) The Permittee shall record the pressure drop across the wet scrubber used in conjunction with the two (2) aluminum melt furnaces (Unit 1-A), at least once per day when the two (2) aluminum melt furnaces (Unit 1-A) are in operation. When for any one reading, the pressure drop across the wet scrubber is outside the normal range of 3.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.

A pressure reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) The Permittee shall install a flow meter on the wet scrubber within 120 days of the date of issuance of this permit and shall establish a minimum flow rate necessary to ensure the correct operation of the wet scrubber. After the installation of the flow meter, the Permittee shall record the flow rate at least once per day when the two (2) aluminum melt furnaces (Unit 1-A) are in operation. When for any one reading, the flow rate is less than 3 gallons per minute or the minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

(c) The instruments used for determining the pressure reading and flow rate shall comply with Section C - Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.9 Failure Detection

In the event that a scrubber malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.3, the Permittee shall keep a one time signed certification from each metal supplier, stating that the metal supplied to Keihin IPT Manufacturing, Inc., qualifies as clean metal as defined in Condition D.1.3.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain records of once per day visible emission notations of the stack exhaust for the two (2) aluminum furnaces (Unit 1-A).

(c) To document compliance with Condition D.1.8, the Permittee shall maintain records of the following operational parameters for the wet scrubber once per day:

(1) pressure drop; and

(2) flow rate.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) Unit 2 Aluminum facilities, constructed in 1988 and consisting of:

(1) Eleven (11) shell core machines, each with a maximum sand throughput of 228 pounds per hour;

(2) Sixteen (16) die-casting machines, each with a maximum metal and sand throughput of 594 and 157 pounds per hour respectively; and

(3) Nine (9) core knockout machines each with a maximum metal and sand throughput of 975 and 258 pounds per hour respectively.

The shell core machines and die-casting machines are controlled by three (3) baghouses and exhaust at stacks EF-49, EF-101, and EF-107. The nine (9) core knockout machines are controlled by nine (9) dust collectors.

(c) Four (4) aluminum die-casting machines (identified as UBE # 1 through 4), each with a maximum metal and sand throughput of 594 and 157 pounds per hour respectively, controlled by a baghouse and exhausting at stack EF-120. This unit was constructed in 1988.

Insignificant Activities:

(b) One (1) shot blasting unit, (identified as Unit 3) with a maximum capacity of 2,833 pounds of zinc shot per month. This unit was installed in 1990 [326 IAC 6-3].

(c) One (1) shot blasting unit (identified as Unit 5), with a maximum throughput rate of 1,000 pounds of glass beads per month. This unit was installed in 2003 [326 IAC 6-3].

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the aluminum die casting facilities consisting of eleven (11) shell core machines, twenty (20) die casting machines, and nine (9) core knockout machines, shall not exceed the pound per hour emission limit as shown in the following table:

Emission Units	Process Weight (tons/hour)	Process Weight (lbs/hour)	Particulate Emission Limit (lbs/hour)
Each of the 11 Shell Core Machines	0.11	228	0.96
Each of the 20 Die Casting Machines	0.38	751	2.13
Each of the 9 Core Knockout Machines	0.62	1,233	2.96

The pound per hour limit was calculated using 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:

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

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) and which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. Therefore, each of the two (2) shot blasting units shall not exceed 0.551 pounds of particulate emissions per hour.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(d) Machining and washing processes (identified as Unit 4) consisting of injector component machines with a maximum usage rate of 1.35 gallons per hour, and using one (1) Durr thermal oxidizer as control. This unit was installed in 1989.

Insignificant Activities:

(a) Degreasing operations using an aqueous based cleaner with a maximum usage rate of 145 gallons per year and that is not subject to 326 IAC 20-6. This unit was constructed in 1989. [326 IAC 8-3-2]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, (New Facilities - General Reduction Requirements), and FESOP No. F059-9160-00013 issued, May 29, 1998, the Permittee shall operate the Durr thermal oxidizer at all times the mineral spirits machining and washing processes are in operation, except during periods (not to exceed 12 hours in duration at a time) in which VOC emissions are captured on the zeolite wheel for later desorption and destruction. The thermal incinerator shall maintain a minimum operating temperature, when in use, of 1,350EF or a temperature determined in the compliance tests to maintain a minimum overall 85% destruction of VOC emissions.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for the cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

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

D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and control devices.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1)][326 IAC 2-1.1-11]

The Permittee shall conduct a performance test to determine compliance with Condition D.3.1 utilizing methods as approved by the Commissioner. This test shall be performed between January 2006 and May 2006 and shall be repeated at least once every five (5) years from the date

of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.5 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For purposes of this condition, continuous means no less than one per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1,350EF. A 3-hour average temperature of 1,350EF that is below 1,350EF is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limit in Condition D.3.1, as approved by IDEM, OAQ.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the average temperature observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)]

D.3.6 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.1, as approved by IDEM, OAQ.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.1:

(1) The Permittee shall keep continuous temperature records (on 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) The Permittee shall keep records of the duration, startup, and shutdown period for the zeolite wheel operation.

(b) To document compliance with Condition D.3.6(b), the Permittee shall keep daily records of the duct pressure or fan amperage.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(e) Two (2) natural gas-fired Cleaver Brooks boilers (identified as B-1 and B-2), each with a maximum heat input capacity of 10.46 MMBtu per hour, and exhausting at stacks B-1 and B-2. Boiler B-1 was installed in 1989 and boiler B-2 was installed in 1999.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to B-2 as described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.4.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected sources, as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

D.4.3 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]

(a) The affected sources are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of the effective date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three years after the effective date of 40 CFR 63, Subpart DDDDD.

(b) The following emissions units comprise the affected source for the large gaseous fuel subcategory: two (2) natural gas-fired Cleaver Brooks boilers, each with a maximum heat input capacity of 10.46 MMBtu per hour.

(c) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected sources.

D.4.4 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating), the PM emissions from the two (2) Cleaver Brooks boilers (identified as B-1 and B-2) shall not exceed 0.59 and 0.49 pounds per million British thermal units (lbs/MMBtu) of heat input, respectively.

These limitation are based on 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 heat input. The total source maximum heat input capacity is 10.461 MMBtu/hour for B-1 and 20.922 MMBtu/hour for B-2

D.4.5 Preventive Maintenance Plan [326 IAC 2-7-15(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

D.4.6 Record Keeping Requirements

(a) Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), the Permittee shall maintain daily fuel records for B-2.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Keihin IPT Manufacturing, Inc.
Source Address: 400 West New Road, Greenfield, Indiana 46140
Mailing Address: 400 West New Road, Greenfield, Indiana 46140
Part 70 Permit No.: T059-16006-00013

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Affidavit (specify) _____

Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2551
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Keihin IPT Manufacturing, Inc.
Source Address: 400 West New Road, Greenfield, Indiana 46140
Mailing Address: 400 West New Road, Greenfield, Indiana 46140
Part 70 Permit No.: T059-16006-00013

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Keihin IPT Manufacturing, Inc.
Source Address: 400 West New Road, Greenfield, Indiana 46140
Mailing Address: 400 West New Road, Greenfield, Indiana 46140
Part 70 Permit No.: T059-16006-00013

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ____________________

Title/Position: ____________________

Date: ____________________

Phone: ____________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD)
for a Part 70 Operating Permit

Source Background and Description

Source Name:	Keihin IPT Manufacturing, Inc.
Source Location:	400 West New Road, Greenfield, Indiana 46140
County:	Hancock
SIC Code:	3714
Operation Permit No.:	059-16006-00013
Permit Reviewer:	ERG/SD

On July 20, 2004 the Indiana Department of Environmental Management (IDEM) and Office of Air Quality (OAQ) had a notice published in the Daily Reporter, Greenfield, Indiana, stating that Keihin IPT Manufacturing, Inc. had applied for a Part 70 Operating Permit (Title V) to operate a plant manufacturing electric fuel injection systems for automobiles. The notice also stated that IDEM, 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 August 16, 2004, Keihin IPT Manufacturing, Inc. submitted comments on the proposed Title V permit. The summary of the comments and responses are shown below. Deleted text is shown in ~~strikeout~~ and new text is shown in **bold**. The Table of Contents has been updated as necessary.

Comment 1:

The Permittee commented that the seven (7) aluminum melt furnaces as described in facility description (a)(1) in Section A.2 incorrectly states that the furnaces are designed to flux in sequence. There is no design restraint on the furnaces that restricts the furnaces to flux in sequence. The exhaust from the seven (7) aluminum melt furnaces is fluxed in sequence by operational control procedures and this has no bearing on the design of the emission unit in itself.

Response to Comment 1:

Facility description (a)(1) in Section A.2 has been revised as shown below. Section D.1 has been revised so that it agrees with the description shown below.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Aluminum furnaces consisting of:

(1) Seven (7) aluminum melt furnaces, ~~designed to flux in sequence~~ (identified as Unit 1-A and Unit 1-B), processing aluminum ingots and flux, using a wet scrubber as control ~~during fluxing~~ and exhausting at stack EF-48. Two (2) furnaces (Unit 1-A) each have a maximum throughput capacity of 2,500 pounds per hour; and five (5) furnaces (Unit 1-B) each have a maximum throughput

capacity of 1,100 pounds per hour. These units were constructed between 1989 and 1995.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Aluminum furnaces consisting of:

(1) Seven (7) aluminum melt furnaces, ~~designed to flux in sequence~~ (identified as Unit 1-A and Unit 1-B), processing aluminum ingots and flux, using a wet scrubber as control ~~during fluxing~~ and exhausting at stack EF-48. Two (2) furnaces (Unit 1-A) each have a maximum throughput capacity of 2,500 pounds per hour; and five (5) furnaces (Unit 1-B) each have a maximum throughput capacity of 1,100 pounds per hour. These units were constructed between 1989 and 1995.

. . . . .

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

Comment 2:

The Permittee requested the following revisions and corrections to the facility descriptions in Section A.2.

1. Item (a)(2): Correct the stack ID of the baghouse controlling the one (1) aluminum melt furnace (identified as HPDC # 3) from stack EF-60 to EF-120.

2. Item (a)(3): Correct the baghouse ID controlling the two (2) reverberatory furnaces (identified as Unit 9 and 10) from baghouse EF-60 to baghouse 4; and correct the corresponding stack ID from EF-60 to EF-120.

3. Item (b): Correct the number of core knockout machines at the die casting facility from ten (10) to nine (9). Furthermore, the Permittee requested to remove the reference to the four (4) shell core machines from the permit, since the source ceased their operation on August 13, 2004 and plans to remove them no later at the end of 2004.

Response to Comment 2:

The facility descriptions under Sections A.2, D.1, and D.2 have been revised and corrected as requested by the Permittee. The two (2) aluminum melt furnace and two (2) reverberatory furnaces are also used for flux. Therefore, the facility descriptions (a)(2) and (a)(3) were revised as shown below.

Also, since the number of core knockout machines at the die casting facility are now nine (9) instead of the original ten (10); and the number of shell core machines are now eleven (11) instead of the original fifteen (15), Condition D.2.1 (a) has been revised to be consistent with this change. In addition metal and sand throughputs have been separated for Unit 2 aluminum facilities and four (4) die-casting machines.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Aluminum furnaces consisting of:

. . . . .

(2) One (1) aluminum melt furnace (identified as HPDC furnace # 3), with a maximum throughput capacity of 1,100 pounds of ~~clean~~ aluminum **ingots and flux per hour**, controlled by a baghouse and exhausting at stack EF-~~60~~**120**. This unit was constructed in 1991.

(3) Two (2) reverberatory furnaces (identified as melt furnace Unit 9 and Unit 10), each with a maximum throughput rate of 1,500 pounds of ~~clean~~ aluminum **ingots and flux** per hour, using natural gas as fuel, each with a maximum heat capacity of 1.265 MMBtu per hour, controlled by a baghouse ~~EF-60~~**4**, and exhausting at stack EF-~~60~~**120**. These units were constructed in 2003.

(b) **Unit 2** Aluminum ~~die-casting~~ facilities**, constructed in 1988 and** ~~(identified as Unit 2)~~ consisting of:

(1) **Eleven (11)**~~fifteen (15)~~ shell core machines, **each with a maximum sand throughput of 228 pounds per hour;**

(2) **S**~~s~~ixteen (16) die-casting machines, ~~and~~ **each with a maximum metal and sand throughput of 594 and 157 pounds per hour respectively; and**

(3) **Nine (9)**~~ten (10)~~ core knockout machines~~.~~ **each with a maximum metal and sand throughput of 975 and 258 pounds per hour, respectively.** ~~Fifteen (15) shell core machines each have a maximum sand throughput of 228 pounds per hour; sixteen (16) die-casting machines each have a maximum metal and sand throughput of 751 pounds per hour; ten (10) core knockout machines each have a maximum metal and sand throughput of 1,233 pounds per hour.~~

The shell core machines and die-casting machines are controlled by three (3) baghouses and exhaust at stacks EF-49, EF-101, and EF-107. The **nine (9)** core knockout machines are controlled by **nine (9)**~~ten (10)~~ dust collectors. ~~These units were constructed in 1988.~~

(c) Four (4) aluminum die-casting machines (identified as UBE # 1 through 4), each with a maximum **metal and sand** throughput ~~capacity~~ of **594 and 157** ~~751~~pounds **per hour respectively** ~~of clean aluminum and sand~~, controlled by a baghouse and exhausting at stack EF-120. This unit was constructed in 1988.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Aluminum furnaces consisting of:

. . . .

(2) One (1) aluminum melt furnace (identified as HPDC furnace # 3), with a maximum throughput capacity of 1,100 pounds of ~~clean~~ aluminum **ingots and flux per hour**, controlled by a baghouse and exhausting at stack EF-~~60~~**120**. This unit was constructed in 1991.

(3) Two (2) reverberatory furnaces (identified as melt furnace Unit 9 and Unit 10), each with a maximum throughput rate of 1,500 pounds of ~~clean aluminum~~ **aluminum ingots and flux** per hour, using natural gas as fuel, each with a maximum heat capacity of 1.265 MMBtu per hour, controlled by a baghouse ~~EF-60~~**4**, and exhausting at stack EF-~~60~~**120**. These units were constructed in 2003.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) **Unit 2** Aluminum ~~die-casting~~ facilities**, constructed in 1988 and** ~~(identified as Unit 2)~~ consisting of:

(1) **Eleven (11)**~~fifteen (15)~~ shell core machines, **each with a maximum sand throughput of 228 pounds per hour;**

(2) **S**~~s~~ixteen (16) die-casting machines, ~~and~~ **each with a maximum metal and sand throughput of 594 and 157 pounds per hour respectively; and**

(3) **Nine (9)**~~ten (10)~~ core knockout machines~~.~~ **each with a maximum metal and sand throughput of 975 and 258 pounds per hour, respectively.** ~~Fifteen (15) shell core machines each have a maximum sand throughput of 228 pounds per hour; sixteen (16) die-casting machines each have a maximum metal and sand throughput of 751 pounds per hour; ten (10) core knockout machines each have a maximum metal and sand throughput of 1,233 pounds per hour.~~

The shell core machines and die-casting machines are controlled by three (3) baghouses and exhaust at stacks EF-49, EF-101, and EF-107. The **nine (9)** core knockout machines are controlled by **nine (9)**~~ten (10)~~ dust collectors. ~~These units were constructed in 1988.~~

. . . . .

(c) Four (4) aluminum die-casting machines (identified as UBE # 1 through 4), each with a maximum **metal and sand** throughput ~~capacity~~ of **594 and 157** ~~751~~pounds **per hour respectively** ~~of clean aluminum and sand~~, controlled by a baghouse and exhausting at stack EF-120. This unit was constructed in 1988.

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

D.2.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the aluminum die casting facilities consisting of **eleven (11)** ~~fifteen (15)~~ shell core machines, twenty (20) die casting machines, and **nine (9)** ~~ten (10)~~ core knockout machines, shall not exceed the pound per hour emission limit as shown in the following table:

Emission Units	Process Weight (tons/hour)	Process Weight (lbs/hour)	Particulate Emission Limit (lbs/hour)
Each of the **11**~~15~~ Shell Core Machines	0.11	228	0.96
Each of the 20 Die Casting Machines	0.38	751	2.13
Each of the **9**~~10~~ Core Knockout Machines	0.62	1,233	2.96

. . .

Comment 3:

The Permittee requested an existing shot blasting unit (identified as Unit 5) which was installed in 2003, be included in Section A.3 - Insignificant activities.

Response to Comment 3:

The shot blasting unit has been included in Section A.3 since this unit meets the definition of an insignificant activity in 326 IAC 2-7-1(21)(B) because the uncontrolled potential to emit of PM and PM10 are less than five (5) pounds per hour (See Appendix A of the addendum, page 7 of 10). The shot blast unit has been added to Section D.2 as shown below.

Since the maximum throughput rate of an additional existing shot blasting unit (identified as Unit 5) at the source, now included under Section A.3 - Insignificant Activities, is less than 100 pounds per hour, it is subject to the provisions of 326 IAC 6-3-2, which limits the particulate emissions from any process not exempt under 326 IAC 6-3-1 that has a maximum process weight rate less than 100 pounds per hour to 0.551 pounds per hour. Therefore, particulate emissions from the shot blasting unit (identified as Unit 5) shall not exceed 0.551 pounds of particulate per hour.

The potential to emit of PM and PM10 from the entire source is equal to 260 and 170 tons per, year respectively. The addition of this insignificant activity does not change the current permit status of the source.

For clarification purposes IDEM, OAQ has re-numbered the specifically regulated insignificant activities in the permit.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

. . . .

(c) One (1) shot blasting unit (identified as Unit 5), with a maximum throughput rate of 1,000 pounds of glass beads per month. This unit was installed in 2003 [326 IAC 6-3].

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

. . . .

Insignificant Activities:

(**b**~~e~~) One (1) shot blasting unit ~~using zinc shot,~~ (identified as Unit 3) with a maximum capacity of 2,833 pounds of zinc shot per month. This unit was installed in 1990 [326 IAC 6-3].

(**c**) **One (1) shot blasting (identified as Unit 5), with a maximum throughput rate of 1,000 pounds of glass beads per month. This unit was installed in 2003 [326 IAC 6-3].**

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

D.2.1 Particulate [326 IAC 6-3-2]

. . . .

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) and which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. Therefore, ~~the one (1)~~**each of the two (2)** shot blasting unit**s** shall not exceed 0.551 pounds of particulate emissions per hour.

Comment 4:

The Permittee requested IDEM change the unit IDs in Section D.4 for the two (2) boilers from Unit 9 and Unit 10 to B-1 and B-2, respectively, as indicated in the facility description (e).

Response to Comment 4:

Conditions D.4.1 through D.4.6 have been amended to cite the correct unit ID. Note that the unit IDs were correctly listed as B-1 and B-2 in Condition A.2 and in the facility description in Section D.4. Condition D.4.7 was deleted from the permit because the notification requirement pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b) is already past the 120 day time period after the effective date of 40 CFR 63, Subpart DDDD.

D.4.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to ~~Unit 10~~**B-2** as described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.4.4 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating), the PM emissions from the two (2) Cleaver Brooks boilers (identified as ~~Unit 9 and Unit 10B-1~~ **B-1 and B-2**) shall not exceed 0.59 and 0.49 pounds per million British thermal units (lbs/MMBtu) of heat input, respectively.

These limitation are based on 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 heat input.

The total source maximum heat input capacity is 10.461 MMBtu/hour for ~~Unit 9~~**B-1** and 20.922 MMBtu/hour for ~~Unit 10~~**B-2**

D.4.6 Record Keeping Requirements

(a) Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), the Permittee shall maintain daily fuel records for ~~Unit 10~~**B-2**.

~~D.4.7 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]~~

~~(a) Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the effective date of 40 CFR 63, Subpart DDDDD as required by 40 CFR 63.7545(b).~~

~~(b) The notification required by paragraph (a) shall be submitted to:~~

~~Indiana Department of Environmental Management~~
~~Compliance Data Section, Office of Air Quality~~
~~100 North Senate Avenue~~
~~Indianapolis, Indiana 46204~~

~~The notification requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Comment 5:

The Permittee requested Condition B.8 which requires certification "...where specifically designated by this permit or required by an applicable requirement ..." be revised to remove that phrase because the Permittee would like to be held accountable for only the applicable requirements as listed in the Part 70 permit.

Response to Comment 5:

Pursuant to 326 IAC 2-7-4(f), the Permittee is required to include a "certification by a responsible official of the truth, accuracy, and completeness" for any application form, report, or compliance certification submitted by the Permittee to IDEM, OAQ. Since the language in Condition B.8(a) is consistent with 326 IAC 2-7-4(f), no changes have been made to the permit.

Comment 6:

The Permittee requested Condition B.10 (a)(1), which requires identification of individuals responsible for inspecting, maintaining, and repairing emission control devices, be revised to specify that individuals be identified by a job title or classification because this would provide flexibility in the event that the certifying individual responsible for the Preventive Maintenance Plan (PMP) changes.

Response to Comment 6:

The Permittee's request has been incorporated in Condition B.10(a)(1) as shown in Response to Comment 19 on page 23 of 25 in this addendum.

Comment 7:

The Permittee requested Condition C.11, which requires all monitoring and record keeping requirements not already legally required to be implemented within thirty (30) days of permit issuance, be changed to ninety (90) days to be consistent with Condition C.20 (b).

Response to Comment 7:

Condition C.11 (now C.10) has been revised to be consistent with Condition C.20(b) (now C.19(b)) as shown below.

C.**10**~~11~~ Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ~~thirty (30)~~ **ninety (90)** days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within **ninety (90)**~~thirty (30)~~ days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

. . .

Comment 8:

The Permittee requested that Condition C.17, which requires the Compliance Response Plan (CRP) to be prepared within sixty (60) days after the issuance of the permit, be extended to ninety (90) days after the issuance of the permit to allow sufficient time to prepare the CRP.

Response to Comment 8:

IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

C.~~17~~**16** ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** [326 IAC 2-7-5][326 IAC 2-7-6]

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~

~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~

~~(1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification to the permit, and such request has not been denied.~~

~~(3) An automatic measurement was taken when the process was not operating.~~

~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~

~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~

~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or

malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

Comment 9:

The Permittee requested that all compliance testing, monitoring, and determination requirements as described in Conditions D.1.3 through D.1.9, and all record keeping requirements as described in Condition D.1.10 for the seven (7) aluminum melt furnaces be removed from the permit. These requirements are not warranted because an incorrect emission factor (4.3 lb PM per ton - from AP-42, Table 12.8-2, Secondary Aluminum Operations) was applied for fluxing. By using the correct emission factor (1.1 lb PM per ton - from Air Quality Permits, Vol.1, (1991 Edition) by STAPPA/ALAPCO) , the potential to emit before controls for each of the furnaces is less than the allowable emission rate as calculated using an equation found in 326 IAC 6-3-2. Therefore, these furnaces are not required to be controlled and the wet scrubber and baghouses that the source currently uses are not necessary.

Response to Comment 9:

The Permittee has stated that there is no design restriction on the seven (7) aluminum melt furnaces such that the furnaces can only flux in sequence (as identified by the Permittee and incorporated by IDEM, OAQ in the Second Minor Permit Revision No.: 059-14848-00013, issued November 8, 2001). Therefore, a worse case emission factor of 4.3 lb PM per ton and 2.6 lb PM10 per ton for aluminum melting has been used for all seven (7) aluminum melt furnaces. This is consistent with IDEM, OAQ policy for aluminum melting to use AP-42 emission factors whenever possible unless there are site specific stack test results to establish a different

emission factor. The Permittee also indicated that the remaining three (3) aluminum furnaces also flux when required. Therefore, the emission factor used for calculating the potential to emit of PM and PM10 from these furnaces has also been revised from 1.1 lb PM per ton to 4.3 lb PM per ton and 2.6 lb PM10 per ton. Furthermore, an emission factor of 1000 lb PM per ton of chlorine and 532 lb PM10 per ton of chlorine has been used to estimate particulate emissions from fluxing in the furnaces. The potential to emit PM and PM10 from the entire source is now equal to 233 and 150 tons per year, respectively. The revised calculations for this source are provided in Appendix A to this addendum. At the time the source was constructed, the PM and PM10 emissions were calculated to be less than 250 tons per year and the past FESOP for the source did not provide a PSD limit for PM or PM10; however, the AP-42 emission factors for PM and PM10 are rated E. Therefore, a PSD minor source limit has been added to this permit to ensure a minor source status for PSD. The Permittee shall be limited to 5.36 pounds of PM per hour and 3.24 pounds of PM10 per hour, from each of the two (2) furnaces (Unit 1-A). This is equivalent to 23.5 tons of PM per year and 14.2 tons of PM10 per year, from each furnace (Unit 1-A). Compliance with these limits renders the provisions of 326 IAC 2-2 (PSD) inapplicable.

Also, the potential to emit before controls for furnaces (Unit 1-A) in pounds per hour is greater than the allowable emission rate as calculated using the equation in 326 IAC 6-3-2 (see Appendix A, page 5 of 10). Operation of the wet scrubber ensures compliance with 326 IAC 6-3-2. The potential to emit before controls for furnaces Unit 1-B, HPDC 3, Unit 9, and Unit 10 in pounds per hour are less than the allowables calculated using the equation in 326 IAC 6-3-2. Therefore, furnaces Unit 1-B, HPDC3, Unit 9, and Unit 10 do not require the use of a wet scrubber or baghouses in order to comply with the allowable emission rate calculated using the equation in 326 IAC 6-3-2.

Since the wet scrubber must operate properly to ensure Unit 1-A furnaces are in compliance with 326 IAC 6-3-2, the compliance determination, compliance monitoring, and record-keeping requirements included in the draft permit for the wet scrubber are necessary requirements. However, the Permittee will be required to operate the scrubber only when Unit 1-A furnaces are in operation. The Permittee will not be required to perform stack testing on the wet scrubber for furnaces Unit 1-B, HPDC 3, Unit 9 or Unit 10, since these furnaces do not require a control device to comply with the particulate emission limit specified by 326 IAC 6-3-2. Although Keihin currently monitors the pressure drop across the wet scrubber, they are unable to monitor the flow rate because the scrubber is not equipped with a flow meter. According to the Permittee, the system would operate at a 3-gallon per minute if the flowrate was measured. IDEM, OAQ has included conditions in this Title V permit that require Keihin to install a flow meter, establish a minimum flow rate, and monitor and record the flow rate when the Unit 1-A furnaces are in operation. IDEM, OAQ has deleted the requirement to monitor the pH because the wet-scrubber is used to control particulate emissions only. Also, IDEM, OAQ has determined that once per day monitoring of the control device (and of visible emission notations) is generally sufficient to ensure proper operation of the control device. The following changes have been made to the permit. Conditions have been renumbered as necessary.

D.1.1 Particulate [326 IAC 2-2 (PSD)]

Pursuant to 326 IAC 2-2, the PM and PM10 emissions from each of the two (2) furnaces (Unit 1-A) shall not exceed 5.6 and 3.24 pounds per hour, respectively. These limits are equivalent to 23.5 tons of PM per year and 14.2 tons of PM10 per year, from each furnace (Unit 1-A).

Compliance with these limits makes this source minor for 326 IAC 2-2 (PSD).

D.1.~~4~~**5** Particulate Matter (PM)

To comply with Condition D.1.1, **or except as otherwise provided by statute, rule, or this permit**~~the Permittee shall operate~~ the wet scrubber **for PM control shall be in operation and control emissions** at all times **when**~~during fluxing~~ any of the **two (2)**~~seven (7)~~ furnaces (Unit 1-A ~~and Unit 1-B~~) are in operation**.**~~, controlling only the PM emissions generated during fluxing.~~

D.1.~~5~~**6** Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) **Between**~~Within~~ 30 and 36 months after the issuance of this permit and to document compliance with ~~326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)~~**Conditions D.1.1 and D.1.2**, the Permittee shall perform PM **and PM10** testing on the one (1) wet scrubber controlling PM **and PM10** emissions from ~~the seven (7) aluminum melt furnaces. Separate tests shall be performed on any one (1)~~ **the** 2,500 pounds per hour furnace (identified as Unit 1-A) ~~and any one (1) 1,100 pounds per hour furnace (identified as Unit 1-B)~~. Stack testing shall be performed when fluxing ~~and operating at the maximum throughput capacity~~. The stack tests shall be completed using methods as approved by the Commissioner. These stack tests shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. **PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C - Performance Testing.**

D.1.6**7** Visible Emissions Notations

(a) Once per **day**~~shift~~ visible emission notations of the **stack exhaust for two (2)**~~seven (7)~~ aluminum melt furnaces **(Unit 1-A)** ~~stack exhausts~~ shall be performed during normal daylight operations when fluxing. A trained employee shall record whether the emissions are normal or abnormal.

. . . .

(e) **If**~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ abnormal emission**s are** ~~is~~ observed**, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or Exceedances**. Failure to take response steps in accordance with Section C - ~~Compliance~~ **Response to Excursions or Exceedances** ~~Plan - Preparation, Implementation, Records and Reports~~ shall be considered a deviation from this permit.

D.1.7**8** Monitoring of Scrubber Operational Parameters

(a) The Permittee shall record ~~the scrubber flow rate,~~ **the** pressure drop ~~and pH~~ across the wet scrubber used in conjunction with the **two (2)**~~seven (7)~~ aluminum melt furnaces **(Unit 1-A)**, at least once per **day**~~shift~~ when the **two (2)**~~seven (7)~~ aluminum melt furnaces **(Unit 1-A)** are in operation ~~during fluxing~~. When for any one reading, the pressure drop across the wet scrubber is outside the normal range of 3.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- ~~Compliance~~ Response **to Excursions or Exceedances.**~~Plan - Preparation, Implementation, Records, and Reports. When for any one reading, the flow rate across the wet scrubber is less than the minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. When for any one reading, the pH across the wet scrubber is outside the normal range of 6.0 and 9.0 or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports.~~

A pressure reading ~~or pH that is outside the above mentioned range, flow rate~~ that is **outside the normal range** ~~below the above mentioned minimum~~ is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance~~ Response **to Excursions or Exceedances** ~~Plan - Preparation and Implementation~~ shall be considered a **deviation from** ~~violation of~~ this permit.

(b) The Permittee shall install a flow meter on the wet scrubber within 120 days of the date of issuance of this permit and shall establish a minimum flow rate necessary to ensure the correct operation of the wet scrubber. After the installation of the flow meter, the Permittee shall record the flow rate at least once per day when the two (2) aluminum melt furnaces (Unit 1-A) are in operation. When for any one reading, the flow rate is less than 3 gallons per minute or the minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to

take response steps shall be considered a deviation from this permit.

(c) The instrument**s** used for determining the pressure reading **and**~~,~~ flow rate ~~and pH~~ shall comply with Section C - ~~Pressure Gauge and Other~~ Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

~~D.1.8 Wet Scrubber Inspections~~

~~An inspection shall be performed each calender quarter of the wet scrubber controlling the seven (7) aluminum furnaces.~~

D.1.9 Failure Detection

In the event that a scrubber malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with ~~Compliance~~ Response **to Excursions or Exceedances**~~Plan - Preparation and Implementation~~ shall be considered a violation of this permit.

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.~~2~~**3**, the Permittee shall keep a one time signed certification from each metal supplier, stating that the metal supplied to Keihin IPT Manufacturing, Inc., qualifies as clean metal as defined in Condition D.1.2.

(b) To document compliance with Condition D.1.~~6~~**7**, the Permittee shall maintain records of once per **day**~~shift~~ visible emission notations of the **stack exhaust for the two (2)**~~seven (7)~~ aluminum furnace**s (Unit 1-A)**~~ stack exhausts~~.

(c) To document compliance with Condition D.1.~~7~~**8**, the Permittee shall maintain records of the following operational parameters for the wet scrubber once per **day**~~shift during fluxing~~:

(1) pressure drop; **and**

(2) flow rate**.**~~; and~~

~~(3) acid content (pH level).~~

~~(d) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8 and any additional inspections as described by the Preventive Maintenance Plan.~~

(**d**~~e~~) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 10:

The Permittee requested IDEM, OAQ, revise the wording in Condition D.3.1 to remove a redundant sentence.

Response to Comment 10:

Condition D.3.1 has been revised as shown below:

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, (New Facilities - General Reduction Requirements), and FESOP No.

F059-9160-00013 issued, May 29, 1998, **the Permittee shall operate** ~~the machining and washing processes are subject to the requirements of 326 IAC, 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions.~~

~~Pursuant to this rule:~~

~~T~~the Durr thermal oxidizer ~~shall be in operation~~ at all times the mineral spirits machining and washing processes are in operation**,** except during periods (not to exceed 12 hours in duration at a time) in which VOC emissions are captured on the zeolite wheel for later desorption and destruction. The thermal incinerator shall maintain a minimum operating temperature, when in use, of 1,350EF or a temperature determined in the compliance tests to maintain a minimum overall 85% destruction of ~~potential~~ VOC emissions.

Comment 11:

The Permittee requested that Condition D.3.4, which requires a performance test date for the thermal oxidizer, be revised from a specific time period (May, 2006) to "within 18 to 24 months of permit issuance" to allow for flexibility. By revising this condition, the Permittee shall still complete the stack test within five (5) years of the previous test but will not be limited to a specific month.

Response to Comment 11:

Condition D.3.4 has been revised as requested by the Permittee.

D.3.4 Testing Requirements [326 IAC 2-7-6(1)][326 IAC 2-1.1-11]

The Permittee shall conduct a performance test to **determine compliance with Condition D.3.1**~~verify the minimum overall destruction efficiency for the thermal oxidizer~~ utilizing methods as approved by the Commissioner. This test shall be performed **between January 2006 and May 2006**~~no later than in May of 2006~~ and shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Comment 12:

The Permittee requested the following revisions to the TSD:

1. Page 3 of 17 TSD: Facility description (y) under insignificant activities should be corrected from "mister collector..." to "mist collector".

2. Page 7 of 17 TSD: Since Hancock county has been designated as non-attainment for the 8-hour ozone standards for VOC and NOx, paragraph (b) under the County Attainment Status discussion should be corrected from "... attainment or unclassifiable in Indiana for all criteria pollutants ..." to ".. attainment in Indiana for all other criteria pollutants ...".

3. Page 1 of 17 TSD, facility description (a)(1) incorrectly states that the seven (7) aluminum melt furnaces are designed to melt in sequence.

4. Page 2 of 17 TSD, stack IDs for facility descriptions (a)(2) and (a)(3) should be corrected from EF-60 to EF-120; and the baghouse ID for item (a)(3) should be corrected from EF-60 to baghouse 4.

5. Page 2 of 17 TSD, facility description (b) incorrectly refers to ten (10) core knockout machines at the source. The source only operates nine (9) core knockout machines.

6. Page 2 of 17 TSD, facility description (b) should be revised from fifteen (15) shell core machines to eleven (11) shell core machines since the Permittee has ceased operations of four (4) shell core machines on August 13, 2004.

7. Page 6 of 10 TSD Appendix: The potential to emit calculations after control for the die casting facilities comprising 15 shell core machines, 20 die casting machines and 10 core knockout machines are inaccurate. The Permittee only operates eleven (11) shell core machines and nine (9) core knockout machines.

Response to Comment 12:

Although IDEM, OAQ agrees with the above requests, no changes have been made to the TSD because the IDEM, OAQ prefers that the Technical Support Document 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 Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, the IDEM, OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been updated as necessary.

1. The equation in Condition D.1.2 (formerly D.1.1) to calculate the particulate emissions pursuant to 326 IAC 6-3-2 has been corrected from "Interpolation and extrapolation of the data..." to "Interpolation of the data...". The change in the permit is shown below:

D.1.1~~1~~**2** Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes):
. . . .

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:

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

2. Since Hancock County was designated in June 2004 as nonattainment for ozone under the 8-hour standard, the source status under A.1. has been revised as shown below.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary electronic fuel injection system~~s~~ for an automotive components manufacturing plant.

Responsible Official:	Assistant Vice President
Source Address:	400 West New Road, Greenfield, Indiana 46140
Mailing Address:	400 West New Road, Greenfield, Indiana 46140
General Source Phone Number:	(317) 462-3015
SIC Code:	3714
County Location:	Hancock
Source Location Status:	Nonattainment for ~~8-hour~~ Ozone under the **8-hour standard** Attainment for **Ozone under the 1-hour standard and for** all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Minor Source under **Emission Offset** Major Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

3. IDEM has included the following updates in the permit.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] **[326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]**

(a) This permit**, T059-16006-00013,** is issued for a fixed term of five (5) years from the issuance date of this permit, 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 date **of this permit**.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] **[326 IAC 2-7-10.5]**

(a) All terms and conditions of ~~previous~~ permits **established prior to T059-16006-00013 and** issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised **under 326 IAC 2-7-10.5**, or

(3) deleted **under 326 IAC 2-7-10.5.**

~~by this permit.~~

(b) **Provided that all terms and conditions are accurately reflected in this permit, ~~A~~a**ll previous registrations and permits are superseded by this **Part 70 operating** permit.

B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] **[326 IAC 2-7-8(e)]**

. . . .

(b) ~~Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~

~~(1)~~ A timely renewal application is one that is:

(~~A~~**1**) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(~~B~~**2**) 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.

~~(2) 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.~~

(c) ~~Right to Operate After Application for Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]~~
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

~~(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]~~
~~If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.~~

B.25 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) The condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) The emission unit to which the condition pertains permanently ceases operation.

4. A statement has been added to B.8(b) in order to clarify that the certification form may cover more than one document that is submitted.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

. . . .

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. **One (1) certification may cover multiple forms in one (1) submittal.**

. . . .

5. A statement concerning backup fuel switches has been added to Condition B.19, in addition to revisions to Conditions B.19(a)(3), (a)(5), and B.19(c).

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

. . .

(3) The changes do not result in emissions which exceed the **limitations provided in** ~~emissions allowable under~~ this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-**2551**

. . .

(5) The Permittee maintains records on-site ~~which document,~~ on a rolling five (5) year basis, **which document** all such changes and emissions~~ trading~~**trades** that are subject to 326 IAC 2-7-20(b), (c), or (e)**.** ~~and~~**The Permittee shall** make~~s~~ such records available, upon reasonable request, for public review.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of the permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

6. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that has been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been

revised to remove (a) which contained these requirements, and since the requirements of the 326 IAC 6-3-2(d) that were effective June 12, 2002 are now federally enforceable, the last statement from C.1 has been removed.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour ~~[40 CFR 52 Subpart P]~~ [326 IAC 6-3-2]

~~(e) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~(f)~~ Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. ~~This condition is not federally enforceable.~~

7. Upon further review, IDEM has determined to remove Condition C.6 - Operation of Equipment because the requirements in this condition have been included in Section D. Remaining conditions in Section C were renumbered accordingly.

~~C.6 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

8. The term “calendar year” has been clarified in Condition C.20(e). Also, in order to reflect the NSR reform rules, conditions (f), (g), and (h) were added to C.20.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] **[326 IAC 2-2]**

...

(e) 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. Reporting periods are based on calendar years**, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive**.

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).

(4) Any other information that the Permittee deems fit to include in this report:

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

9. The zeolite wheel operation used in conjunction with the machining and washing processes (identified as Unit 4) is limited to less than 12 hours of use at a time as required under Condition D.3.1 (326 IAC 8-1-6). Condition D.3.7 was revised to add recordkeeping for the zeolite wheel operation.

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.1~~,~~ **:**

(1) The Permittee shall keep continuous temperature records (on 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) The Permittee shall keep records of the duration, startup, and shutdown period for the zeolite wheel operation.

...

~~(c) To document compliance with Condition D.3.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

(**c~~d~~**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

10. Condition D.3.5(a) was revised to add "For the purpose of this condition, continuous means no less than once per minute" to ensure continuous monitoring system is operating as required by the permit. References to the Compliance Response Plan were removed and replaced with "Response to Excursions or Exceedances".

D.3.5 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. **For purposes of this condition, continuous means no less than one per minute.** The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** whenever the 3-hour average temperature of the thermal oxidizer is below 1,350EF. A 3-hour average temperature of 1,350EF that is below 1,350EF is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance~~

~~Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

...

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** whenever the hourly average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the average temperature observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

11. Conditions D.1.4 (formerly D.1.3) and D.4.5 were revised from "... of this permit, is required for this facilities." to "....of this permit, is required for these facilities."

D.1.3~~4~~ Preventive Maintenance Plan [326 IAC 1-6-3]

A preventive maintenance plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for **the two (2) furnaces (Unit 1-A)** ~~this facility~~ and control devices.

D.4.5 Preventive Maintenance Plan [326 IAC 2-7-15(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **these**~~this~~ facilities.

12. Section A.3 and D.3 for specifically regulated insignificant activities was re-numbered as show below.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

(**a**~~b~~) Degreasing operations using an aqueous based cleaner with a maximum usage rate of 145 gallons per year and that is not subject to 326 IAC 20-6. This unit was constructed in 1989 [326 IAC 8-3-2].

(**b**~~c~~) One (1) shot blasting unit ~~using zinc shot~~, (identified as Unit 3) with a maximum throughput rate of 2,833 pounds of zinc shot per month. This unit was installed in 1990 [326 IAC 6-3].

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(d) Machining and washing processes (identified as Unit 4) consisting of injector component machines with a maximum usage rate of 1.35 gallons per hour, and using one (1) Durr thermal oxidizer as control. This unit was installed in 1989.

Insignificant Activities:

(~~a~~b) Degreasing operations using an aqueous based cleaner with a maximum usage rate of 145 gallons per year and that is not subject to 326 IAC 20-6. This unit was constructed in 1989. [326 IAC 8-3-2]

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

13. The Quarterly Deviation and Compliance Monitoring Report has been updated as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Keihin IPT Manufacturing, Inc.
Source Address: 400 West New Road, Greenfield, Indiana 46140
Mailing Address: 400 West New Road, Greenfield, Indiana 46140
Part 70 Permit No.: T059-16006-00013

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. ~~Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

...

14. The mailing address for IDEM, OAQ has been changed as follows. This change has been made throughout the permit.

Indiana Department of Environmental Management
100 North Senate Avenue~~, P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

15. In order to reflect the NSR reform rules, C.19 (formerly C.20) has been revised as follows:

C.**19**~~20~~ General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] **[326 IAC 2-2]**

…

(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

16. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into your permit as follows:

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

17. The notification as required by 40 CFR 63, Subpart DDDD is no longer required to be submitted to U.S. EPA, Region V. Therefore, Condition D.4.7 has been revised as shown below.

D.4.7 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

. . . .

(b) The notification required by paragraph (a) shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2551

~~and~~

~~United States Environmental Protection Agency, Region V~~
~~Director, Air and Radiation Division~~
~~77 West Jackson Boulevard~~
~~Chicago, Illinois 60604-3590~~

The notification requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

18. Hancock County has been classified as attainment for PM 2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM 2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM 2.5 emissions. As a result of this change, the County Attainment Status section in the Technical Support Document should read as follows:

The source is located in Hancock County.

Pollutant	Status
PM10	Attainment
PM2.5	**Attainment**
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Non-attainment
CO	Attainment
Lead	Attainment

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. No changes were made to this permit as a result of the above designation.

19. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [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 (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s)**, by job title,** responsible for inspecting, maintaining, and repairing emission control devices;

...

~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

(**b**~~c~~) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(**c**~~d~~) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for the unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

. . .

(e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However,** IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

20. IDEM, OAQ realizes that these specifications can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM, OAQ has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

C.**13**~~14 Pressure Gauge and Other~~ Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall** have a scale such that the expected ~~normal~~ **maximum** reading **for the normal range** shall be no less than twenty percent (20%) of full scale ~~and be accurate within plus or minus two percent (?2%) of full scale reading~~.

~~(b) Whenever a condition in this permit requires the measurement of voltage or current across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two five percent (?2%) of full scale reading.~~

~~(c) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading~~

~~shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (?2%) of full scale reading.~~

~~(d) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~

~~(c)~~ **(b)** The Permittee may request **that** the IDEM, OAQ approve the use of ~~a pressure gauge or other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate **that** an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.

21. IDEM, OAQ has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, Conditions D.3.7(c), and D.4.6(b) that correspond to PMP recordkeeping requirements have been deleted from the permit. Condition D.1.10(d) was deleted under Comment 9.

D.1.10 Record Keeping Requirements

. . .

~~(d) To document compliance with Condition D.1.8**9**, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8**9** and any additional inspections as described by the Preventive Maintenance Plan.~~

(**d~~e~~**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.1:

(1) The Permittee shall keep continuous temperature records (on 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) The Permittee shall keep records of the duration, startup, and shutdown period for the zeolite wheel operation.

(b) To document compliance with Condition D.3.6(b), the Permittee shall keep daily records of the duct pressure or fan amperage.

~~(c) To document compliance with Condition D.3.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

(**c~~d~~**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.6 Record Keeping Requirements

(a) Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), the Permittee shall maintain daily fuel records for B-2.

~~(b) To document compliance with Condition D.4.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

(**b**~~c~~) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Keihin IPT Manufacturing, Inc.
Source Location:	400 West New Road, Greenfield, Indiana 46140
County:	Hancock
SIC Code:	3714
Operation Permit No.:	T059-16006-00013
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Keihin IPT Manufacturing, Inc. relating to the operation of a stationary automotive components manufacturing plant.

History

The source was issued a Federally Enforceable State Operating Permit (FESOP) no. 059-9160-00013 on May 29, 1998 and applied for a FESOP renewal no. 059-16006-00013 on August 27, 2002. During source review of the draft FESOP renewal, the Permittee requested permission to operate their existing stationary automotive components manufacturing plant pursuant to 326 IAC 2-7 (Part 70 Permit Program).

At the time of construction in 1988, this source was a minor source under PSD because the potential to emit of PM and each criteria pollutant before controls was less than the PSD major source threshold of 250 tons per year. After each modification since its construction, the potential to emit of PM and each criteria pollutant was calculated to be less than 250 tons per year PSD threshold.

Permitted Emission Units and Pollution Control Equipment

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

(a) Aluminum furnaces consisting of:

(1) Seven (7) aluminum melt furnaces designed to flux in sequence (identified as Unit 1-A and Unit 1-B), processing aluminum ingots and flux, using a wet scrubber as control during fluxing and exhausting at stack EF-48. Two (2) furnaces (Unit 1-A) each have a maximum throughput capacity of 2,500 pounds per hour; and five (5) furnaces (Unit 1-B) each have a maximum throughput capacity of 1,100 pounds per hour. These units were constructed between 1989 and 1995.

Note: Pursuant to the Second Minor Permit Revision No. 059-14848-00013, issued November 8, 2001, the aluminum melt furnaces use clean charge only and are designed to flux in sequence (i.e. one furnace at a time).The wet scrubber associated with the seven (7) aluminum melt furnaces are required to

be in operation at all times when the seven (7) aluminum melt furnaces are in operation and control emissions during fluxing only.

(2) One (1) aluminum melt furnace (identified as HPDC furnace # 3), with a maximum throughput capacity of 1,100 pounds of clean aluminum, controlled by a baghouse and exhausting at stack EF-60. This unit was constructed in 1991.

(3) Two (2) reverberatory furnaces (identified as melt furnace Unit 9 and Unit 10), each with a maximum throughput rate of 1,500 pounds of clean aluminum per hour, using natural gas as fuel, each with a maximum heat capacity of 1.265 MMBtu per hour, controlled by a baghouse EF-60, and exhausting at stack EF-60. These units were constructed in 2003.

(b) Aluminum die-casting facilities (identified as Unit 2) consisting of fifteen (15) shell core machines, sixteen (16) die-casting machines, and ten (10) core knockout machines. Fifteen (15) shell core machines each have a maximum sand throughput of 228 pounds per hour; sixteen (16) die- casting machines each have a maximum metal and sand throughput of 751 pounds per hour; ten (10) core knockout machines each have a maximum metal and sand throughput of 1,233 pounds per hour. The shell core machines and die-casting machines are controlled by three (3) baghouses and exhaust at stacks EF-49, EF-101, and EF-107. The core knockout machines are controlled by ten (10) dust collectors. These units were constructed in 1988.

(c) Four (4) aluminum die-casting machines (identified as UBE # 1 through 4), each with a maximum throughput capacity of 751pounds of clean aluminum and sand, controlled by a baghouse and exhausting at stack EF-120. This unit was constructed in 1988.

(d) Machining and washing processes (identified as Unit 4), consisting of injector component machines with a maximum usage rate of 1.35 gallons of mineral spirits per hour, and using one (1) Durr thermal oxidizer as control. This facility was installed in 1989.

(e) Two (2) natural gas-fired Cleaver Brooks boilers (identified as B-1 and B-2), each with a maximum heat input capacity of 10.46 MMBtu per hour and exhausting at stacks B-1 and B-2. Boiler B-1 was installed in 1989 and boiler B-2 was installed in 1999.

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 Advanced Source Modification Approval

There are no new emission units and pollution control equipment receiving advanced source modification during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Three (3) mineral spirits storage tanks, two with storage capacities of 2,000 gallons, and one with a storage capacity of 3,000 gallons. These units were constructed in 1989.

(b) Degreasing operations using an aqueous based cleaner with a maximum usage rate of 145 gallons per year and that is not subject to 326 IAC 20-6. This unit was constructed in 1989 [326 IAC 8-3-2].

(c) VOC and HAP storage vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(d) Filling drums, pails and packaging containers with lubricating oils, waxes, and greases.

(e) Application of oils, greases, lubricants, or other non-volatile materials as temporary protective coatings.

(f) Machining with an aqueous cutting coolant continuously flooding the machining interface.

(g) Machining equipment for brazing, soldering, welding and cutting torches [326 IAC 6-3].

(h) Closed loop heating and cooling systems.

(i) Activities associated with treatment of wastewater streams with an oil and grease content of less than one (1) percent by volume.

(j) Any operation using aqueous solutions containing less than one (1) percent by weight of VOCs and excluding HAPs.

(k) Natural draft cooling towers.

(l) Quenching operations used in conjunction with heat treating processes.

(m) Heat exchanger cleaning and repair.

(n) Trimmers equipped with dust collector [326 IAC 6-3].

(o) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(p) Catch tanks, temporary liquid separators, tanks and fluid handling equipment, used for collecting any material released during a malfunction.

(q) Blow down for any of the following: sight glass, boiler, compressors, pumps and cooling tower.

(r) On-site fire and emergency response training approved by the department.

(s) Stationary fire pumps.

(t) Mold release agents using low volatile products (vapor pressure less than or equal to two (2) kilopascals measured at 38 degrees Celsius.

(u) A laboratory.

(v) Two (2) electrically heated T-6 machines to heat treat parts in the casting area with a maximum throughput rate of 15,000 pounds of water-phosphoric acid per year.

(w) Impregnation used for treating micro holes in aluminum parts, with the parts dipped in a chemical solution (azobisisobutylnitrile) under heat and pressure that "fills" the holes.

(x) Sand storage warehouse storing sand used to create the cores.

(y) Mister Collector collecting water based coolants/cutting oils from the aluminum machining area. The fugitive oils/coolant mists are drawn into an overhead system for collection.

(z) Machining operations (identified as Unit 5), using a mist collector as control, and exhausting at stack EF-44. This unit was constructed in 1989 [326 IAC 6-3].

(aa) Two (2) High Pressure Die Casting (HPDC) machines, identified as HPDC #5 and #6, each with a maximum throughput rate of 1,500 pounds of clean aluminum per hour, controlled by baghouse EF-60, and exhausting at stack EF-60. These units were constructed in 2003 [326 IAC 6-3].

(bb) One (1) shot blasting unit using zinc shot, (identified as Unit 3) with a maximum throughput rate of 2,833 pounds of zinc shot per month. This unit was installed in 1990 [326 IAC 6-3].

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

(a) F059-9160-00013, issued on May 29, 1998.

(b) First Minor Permit Revision 059-10290-00014, issued on March 22, 1999.

(c) First Administrative Amendment 059-11071-00013, issued on July 21, 1999.

(d) Second Administrative Amendment 059-11181-00013, issued on October 1, 1999.

(e) Third Administrative Amendment 059-11862-00013 issued on March 20, 2000.

(f) First Significant Permit Revision 059-11634-00013, denied on March 22, 2000.

(g) Fourth Administrative Amendment 059-12650-00013 issued on October 13, 2000.

(h) Fifth Administrative Amendment 059-14033-00013 issued on April 24, 2001.

(i) Sixth Administrative Amendment 059-14237-00013 issued on July 18, 2001.

(j) Second Minor Permit Revision 059-14848-00013 issued on November 8, 2001.

(k) Third Minor Permit Revision 059-15367-00013, issued on February 22, 2002.

(l) Seventh Administrative Amendment 059-15725-00013, issued on March 25, 2002.

(m) Eight Administrative Amendment 059-15812-00013, issued on July 17, 2002.

(n) Fourth Minor Permit Revision 039-17747-00013, issued on July 9, 2003.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

(a) All FESOP conditions.

Reason not incorporated: The source is transitioning to a TV permit; therefore, the FESOP limits are no longer applicable.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

(a) F059-9160-00013, issued on May 29, 1998.

(1) Condition D.2.1(b): The Durr thermal oxidizer shall be in operation at all times the mineral spirits machining and washing operations are in operation. The thermal incinerator shall maintain a minimum operating temperature of 1,400 degree Fahrenheit, or a temperature determined in the compliance tests to maintain a minimum overall 85% destruction of potential VOC emissions.

For clarification purposes, the original condition has been reworded pursuant to a request from the source dated August 27, 2000. The new language is shown below:

The Durr thermal oxidizer shall be in operation at all times the mineral spirits machining and washing processes are in operation except during periods (not to exceed 12 hours in duration at a time) in which VOC emissions are captured on the zeolite wheel for later desorption and destruction. The thermal incinerator shall maintain a minimum operating temperature, when in use, of 1,350 degrees Fahrenheit, or a temperature determined in the most recent compliance tests to maintain a minimum overall VOC destruction efficiency of 85 percent.

(2) Condition D.2.4: Any change or modification to the machining operation (Unit 5), the ECU assembly operation (Unit 6), the ECU maintenance operation (Unit 7) and the maintenance and production operation (Unit 8) that would lead to an increase in volatile organic compound (VOC) emissions above twenty-five (25) tons per year, as specified in 326 IAC 2-1, must be approved by the Office of Air Quality (OAQ) before any such change or modification can occur.

Reason not incorporated: Machining operation (identified as Unit 5) employs the use of water soluble coolants that are not VOC based. The ECU assembly operation (Unit 6), the ECU maintenance operation (Unit 7), and the maintenance and production operation (Unit 8) are no longer at the source. Therefore, this condition given in permit no. FESOP F059-9160-00013 has been removed.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 administratively complete Part 70 permit application for the purposes of this review was received on August 30, 2003. Additional information was received on October 23, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 10).

Unrestricted Potential To Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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."

This table reflects the unrestricted PTE before controls.

Pollutant	Potential To Emit (tons/year)
PM	154
PM10	128
SO_2	2.50
VOC	47.1
CO	12.8
NO_x	19.0

Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

HAPs	Unrestricted Potential Emissions (tons/year)
Hydrogen Chloride (HCl)	16.9
Hydrogen Fluoride	0.13
Perchloro-Ethylene	5.00
MEK	2.44
Benzene	0.002
Dichlorobenzene	1.70E-04
Formaldehyde	0.011
Hexane	0.255
Toluene	4.82E-04
Total	24.8

(a) The unrestricted potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The unrestricted potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a single HAP is greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit After Issuance (tons/year)						
Emission unit	PM	PM10	SO_2	VOC	CO	NO_X	HAPs
Two (2) Boilers	0.70	0.70	0.05	0.50	7.70	9.16	Negligible
Ten (10) Aluminum Furnaces	52.7	52.7	0.04	0.34	5.15	6.13	16.9
Fifteen (15) Shell Core Machines	8.25	8.25	2.40	0.0	0.0	3.75	0.0
Twenty (20) Die Casting Machines	5.92	5.92	0.0	0.0	0.0	0.0	0.0
Ten (10) Knockout Machines	86.4	60.4	0.0	0.0	0.0	0.0	0.0
Injector Lube				0.06			0.0
Machining and Washing Process	0.0	0.0	0.0	38.0	0.0	0.0	0.0
Degreasing	0.0	0.0	0.0	0.63	0.0	0.0	0.0
Shot Blasting	0.14	0.01	0.0	0.0	0.0	0.0	0.0
Miscellaneous Brake Cleaners	0.0	0.0	0.0	7.57	0.0	0.0	7.57
Total PTE After Issuance	154	128	2.49	47.1	12.8	19.0	24.8

County Attainment Status

The source is located in Hancock County.

Pollutant	Status
PM10	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Non-attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Hancock County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Hancock County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the

State Rule Applicability for the source section.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The Cleaver Brooks boiler (identified as B-1) is not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because it was constructed before June 9, 1989.

(b) The Cleaver Brooks boiler (identified as B-1) is not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Da - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because although constructed after September 18, 1978, it has a heat input capacity less than 250 MMBtu per hour.

(c) The Cleaver Brooks boiler (identified as B-1) is not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Db - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because although constructed after June 19, 1984, it has a heat input capacity less than 100 MMBtu per hour.

(d) The Cleaver Brooks boiler (identified as B-2) is subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because it was constructed after June 9, 1989 and has a heat input capacity greater than 10 MMBtu/hr and less than 100 MMBtu/hr. However, the Cleaver Brooks boiler (identified as B-2) is subject to only the reporting requirements in 40 CFR 60.48c, because it is a natural gas-fired boiler. As per the reporting requirements, the source is required to maintain daily records of the amount of natural gas combusted. If the source desires to change the timing of the recording of the fuel combusted from daily record to monthly record, then the source must send a request for this change to the following address:

George Czerniak
c/o United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17 J)
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

This request should reference the NSPS requirement.

(e) The three (3) existing mineral spirits storage tanks with a combined storage capacity of 7,000 gallons are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) because their capacities are less than 75 cubic meters (10,567 gallons).

There are no other New Source Performance Standards (326 IAC 12) and 40 CFR part 60 applicable to this facility.

(f) The machining and washing processes and the degreasing operation are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning (326 IAC 14)), because only non-halogenated solvents are used in these operations.

(g) This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63.1500, Subpart RRR (National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production) because the die-casting facilities (identified as Unit 2) use only clean aluminum charge and aluminum scrap generated within the source. However, a condition given in the Second Minor Permit Revision 059-14848-00013, issued on November 8, 2001, specified the use of clean aluminum only at the eight (8) aluminum furnaces (identified as Unit 1) where clean aluminum is defined as given below:

(1) molten aluminum,

(2) T-bar,

(3) sow,

(4) ingot,

(5) billet,

(6) pig,

(7) alloying elements,

(8) thermally dried aluminum chips, and

(9) aluminum scrap dried at 650 degree Fahrenheit or higher,

(10) aluminum scrap de-lacquered/de-coated at 900EF or higher,

(11) other gates and risers,

(12) aluminum scrap, shapes, and products, and

(13) scrap material generated on-site by aluminum extruding, rolling, scalping, forging, forming/stamping, cutting, and trimming operations, dried at 650EF or higher or equivalent non-thermal drying process, that are oil- and lubricant-free, unpainted/uncoated, and have no undergone any processes that would cause contamination of the aluminum.

(h) Two (2) natural gas-fired Cleaver Brooks boilers, each with a maximum heat input capacity of 10.46 MMBtu per hour are subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The two (2) natural gas-fired Cleaver Brooks boilers comprise one existing affected source for the large gaseous fuel subcategory, as defined by 40 CFR 63.7506(b), because they meet the criteria in the definition in 40 CFR 63.7575 for the large gaseous fuel subcategory. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected sources after the effective date of 40 CFR 63, Subpart DDDDD, except when otherwise specified in 40 CFR 63 Subpart DDDDD. This rule is not yet published in the Federal Register. A copy of the signed, final rule is available at http://www.epa.gov/ttn/atw/boiler/boilerpg.html.

Pursuant to 40 CFR 63.7506(b), the only requirements that apply to the existing affected sources for the large gaseous fuel subcategory are the initial notification requirements in 40 CFR 63.9(b). The Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the effective date of 40 CFR 63, Subpart DDDDD as required by 40 CFR 63.7545(b).

There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

(i) This source is not subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source.

This source does not contain any units that require the use of a control device to achieve compliance with the representative emission limitations. Therefore, 40 CFR 64 is not applicable to any facilities contained therein.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity 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%) 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.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Keihin IPT Manufacturing, Inc. was constructed in 1988 and is not in one (1) of the twenty-eight (28) categories. This source consists of an aluminum foundry processing clean aluminum and aluminum scrap generated within the source. It does not use secondary scrap brought from other sources. At the time the source was constructed, it was a minor source under PSD because the potential to emit of PM and each criteria pollutant before controls was less than the PSD major source threshold of 250 tons per year. After each modification since its construction, the potential to emit before controls of PM and each criteria pollutants were calculated to be below the 250 tons per year PSD threshold. Therefore, the source is a minor source under PSD and is not subject to the requirements of 326 IAC 2-2.

326 IAC 2-3 (Emission Offset)

This source is a minor source under Emission Offset because the potential to emit of VOC and NOx are less than one hundred (100) tons per year.

326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants (HAPs))

The operation of this automotive components manufacturing plant was constructed prior to July 27, 1997, the applicability date for this rule. A natural gas fired Cleaver Brooks boiler was installed in 1999 while two (2) aluminum furnaces and two (2) high pressure diecasting machines were added in 2003. These new constructions did not result in the potential to emit of a single HAP and combination of HAPs greater than ten (10) and twenty-five (25) tons per year, respectively. Therefore, the source is not subject to the provisions of 326 IAC 2-4.1.

The source submitted information on October 23, 2003 requesting modifications to the eight (8) aluminum furnaces and aluminum die-casting facilities to increase the throughput-rates to their maximum. This modification, which does not include any new construction or reconstruction of the existing units, results in a potential to emit for a single HAP (HCl) greater than ten (10) tons per year due to fluxing from the furnaces all of which were constructed before July 27, 1997). Therefore, the source is not subject to the provisions of 326 IAC 2-4.1.

State Rule Applicability - Aluminum Melt Furnaces and Die Casting Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the automotive components manufacturing plant shall not exceed the particulate emission limits in pounds per hour as shown in the table below:

Emission Units	Process Weight		Particulate Emission Limit (lbs/hour)
	(tons/hour)	(lbs/hour)	
Each of the 2 Aluminum Furnaces (Unit 1-A)	1.25	2,500	4.76
Each of the 6 Aluminum Furnaces (Unit 1-B and HPDC # 3)	0.55	1,100	2.75
Each of the 2 Aluminum Furnaces (Unit 9 and 10)	0.75	1,500	3.38
Each of the 15 Shell Core Machines	0.11	228	0.96
Each of the 20 Die-casting Machines	0.38	751	2.13
Each of the 10 Knockout Machines	0.61	1,233	2.96

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

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:

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

The particulate emissions from the seven (7) aluminum melt furnaces (identified as Unit1-A and Unit 1-B) shall be controlled by a wet-scrubber at all times during fluxing, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Based on the calculations provided in Appendix A, all of the other emissions units are in compliance with this rule (i.e. the potential to emit for each unit is less than the limit provided by 326 IAC 6-3).

(b) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) and which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do no apply shall not exceed 0.551 pounds per hour. Therefore, the shot blasting unit shall not exceed 0.551 pounds per hour.

Based on the calculations provided in Appendix A, this emission unit is in compliance with this rule.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The aluminum melt furnaces and die-casting facilities are not subject to the requirements of 326 IAC 8-1-6, because the potential VOC emissions from these facilities is less than twenty-five (25) tons per year.

State Rule Applicability - Machining and Washing Process

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The machining and washing process (identified as Unit 4) consisting of an injector component machines, was constructed in 1989 and has potential VOC emissions greater than twenty-five (25) tons per year. Therefore, the source shall comply with the previously approved BACT requirements as given in Operation Permit No. OP30-03-93-0069 issued on March 13, 1989 and included in the source's FESOP permit no. F059-9160-00013, issued May 29, 1998.

Pursuant to 326 IAC 8-1-6, the Durr thermal oxidizer shall be in operation at all times the mineral spirits machining and washing processes are in operation except during periods (not to exceed 12 hours in duration at a time) in which VOC emissions are captured on the zeolite wheel for later desorption and destruction. The thermal incinerator shall maintain a minimum operating temperature, when in use, of 1,350 degree Fahrenheit, or a temperature determined in the compliance tests to maintain a minimum overall 85 percent (%) destruction of potential VOC emissions.

326 IAC 8-3-1(Organic Solvent Degreaser Operations)

The machining and washing process (identified as Unit 4) is not subject to the provisions of 326 IAC 8-3-1(Organic Solvent Degreaser Operations) because this facility does not perform degreasing operations. Pursuant to Operation Permit No. OP30-03-93-0069 issued on March 13, 1989, it is subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

326 IAC 8-6 (Organic Solvent Emission Limitations)

The machining and washing process (identified as Unit 4) is not subject to the requirements of 326 IAC 8-6 because this source is located in Hancock County and has a potential to emit of VOC less than one hundred (100) tons per year.

State Rule Applicability - Two Cleaver Brooks Boilers

326 IAC 6-2-4(a) (Particulate Emission Limitations for Source of Indirect Heating)

Pursuant to 326 IAC 6-2-4, the particulate emissions from the boilers (identified as B-1 and B-2), which were constructed after September 21, 1983 shall be limited to the pounds of particulate matter per MMBtu heat input as follows:

Emission Units	Heat Input Capacity (MMBtu per hour)	Emission Rate (lbs per MMBtu)
Boiler (B-1)	10.461	0.59
Boiler (B-2)	10.461	0.49

These limits are based on the following equation:

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

For Boiler (B-1)

$$Pt = \frac{1.09}{(10.461)^{0.26}}$$

$$Pt = 0.59$$

For Boiler (B-2)

$$Pt = \frac{1.09}{(20.92)^{0.26}}$$

$$Pt = 0.49$$

where:

Pt = emission rate limit (lbs per MMBtu)
Q = total source heat input capacity rating in million Btu per hour(MMBtu/per hour).

Based on the emission factors for natural gas fired boilers provided in AP-42, Chapter 1.4, the two (2) Cleaver Brooks boilers are in compliance with this rule.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The two(2) natural gas-fired boilers (identified as B-1 and B-2) do not have a potential to emit of sulfur dioxide greater than twenty-five (25) tons per year. Therefore, this source is not subject to the provisions of 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations).

State Rule Applicability - Insignificant Activities

326 IAC 8-3-2 (Cold Cleaner Operations)

The degreasing operation is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) because the machining and washing process and degreasing operation were constructed after the January 1, 1980 applicability date for this rule.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

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

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

The degreasing operation was existing before July 1, 1990 applicability date for this rule [326 IAC 8-3-1(b)(2)]. Therefore, this unit is not subject to the requirements of this rule.

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Therefore, the welding operation and the cutting torches shall each not exceed 0.551 pounds per hour. The above limit shall be valid until revisions to rule 326 IAC 6-3-1 (Particulate Emission Limitation for Manufacturing Processes) are approved by the EPA into the SIP.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The three (3) mineral spirits storage tanks are not subject to the provisions of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this source is not located in any of the counties listed under this rule.

326 IAC 12 (New Source Performance Standards)

Pursuant to 326 IAC 12 and 326 IAC 1-1-3, storage tanks which store organic liquids must be reviewed pursuant to the July 1, 2000 version of 40 CFR Part 60, Subpart Kb. As a result, although constructed after July 23, 1984, the three (3) mineral spirits storage tanks are not subject to the requirements of 326 IAC 12 because they each have a capacity less than 40 cubic meters (0,567 gallons).

Testing Requirements

(a) Within 30 and 36 months after the issuance of this permit and to document compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the Permittee shall perform PM testing on the one (1) wet scrubber controlling PM emissions from the seven (7) aluminum melt furnaces. Separate tests shall be performed on any one (1) 2,500 pounds per hour furnace (identified as Unit 1-A) and any one (1) 1,100 pounds per hour furnace (identified as Unit 1-B). Stack testing shall be performed when fluxing and operating at the maximum throughput capacity. The stack tests shall be completed using methods as approved by the Commissioner. These stack tests shall be

repeated at least once every five (5) years from the date of the last valid compliance demonstration.

The Permittee is required to conduct stack testing for PM emissions on the one (1) wet scrubber controlling PM emissions from the seven (7) aluminum melt furnaces when fluxing because the wet scrubber must operate correctly for the aluminum melt furnaces to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). The PM emissions from these processes controlled by a wet scrubber constitute greater than 20 % of total PM emissions from the source. Note that PM stack testing requirement was not included in the source's previous operation permit.

(b) Volatile organic matter (VOC) testing for the Durr thermal oxidizer has been included in the Title V permit to ensure a minimum overall destruction efficiency of 85% to comply with 326 IAC 8-1-6 (BACT). This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. The Permittee performed the last stack test in May 2001. Therefore, the source must repeat the compliance test by May 2006.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

1. The machining and washing processes (identified as Unit 4) have applicable compliance monitoring conditions as specified below:

   (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the 3-hour average temperature of the thermal oxidizer is below 1,350EF. A 3-hour average temperature of 1,350EF that is below 1,350EF is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

   (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be

maintained within the normal range as established in most recent compliant stack test.

These monitoring conditions are necessary because the Durr thermal oxidizer must operate properly to ensure compliance with 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

2. The seven (7) aluminum furnaces have applicable compliance monitoring conditions as specified below:

(a) Once per shift visible emission notations of the seven (7) aluminum melt furnaces stack exhausts shall be performed during normal daylight operations when fluxing. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall record the scrubber flow rate, pressure drop and pH across the wet scrubber used in conjunction with the seven (7) aluminum melt furnaces, at least once per shift when the seven (7) aluminum melt furnaces are in operation during fluxing. When for any one reading, the pressure drop across the wet scrubber is outside the normal range of 3.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. When for any one reading, the flow rate across the wet scrubber is less than the minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. When for any one reading, the pH across the wet scrubber is outside the normal range of 6.0 and 9.0 or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports.

A pressure reading or pH that is outside the above mentioned range; or a flow rate that is below the above mentioned minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

(c) An inspection shall be performed each calender quarter of the wet scrubber controlling the seven (7) aluminum furnaces.

These monitoring conditions are necessary because the wet scrubber must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this stationary electronic fuel injection systems for an automotive components manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T059-16006-00013.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Two (2) Cleaver Brooks Boilers (B-1 and B-2)

Company Name: Keihin, IPT Mfg., Inc.
Address: 400 West New Road, Greenfield, Indiana 46140
Title V: 059-16006
Plt ID: 059-00013
Reviewer: ERG/SD
Date: March 23, 2005

Heat Input Capacity (MMBtu/hour)		Potential Throughput (MMCF/year)
20.9	(2 Units Total)	183

Pollutant

	* PM	* PM10	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.60	7.60	0.60	100	5.50	84.0
Potential To Emit (tons/year)	0.70	0.70	0.05	9.16	0.50	7.70

* PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF.
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY
Potential throughput (MMCF/year) = Heat input capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu
PTE (tons/year) = Potential throughput (MMCF/year) * Emission factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Two (2) Cleaver Brooks Boilers (B-1 and B-2)

Company Name: Keihin, IPT Mfg., Inc.
Address: 400 West New Road, Greenfield, Indiana 46140
Title V: 059-16006
Plt ID: 059-00013
Reviewer: ERG/SD
Date: March 23, 2005

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	1.92E-04	1.10E-04	6.87E-03	1.65E-01	3.12E-04

SUM 1.72E-01

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	4.58E-05	1.01E-04	1.28E-04	3.48E-05	1.92E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Emissions due to Natural Gas Combustion Only
From Ten (10) Aluminum Melt Furnaces

Company Name: Keihin, IPT Mfg., Inc.
Address: 400 West New Road, Greenfield, Indiana 46140
Title V: 059-16006
Plt ID: 059-00013
Reviewer: ERG/SD
Date: March 23, 2005

Heat Input Capacity (MMBtu/hour)		Potential Throughput (MMCF/year)
14.0	(10 units total)	123

Pollutant

	* PM	* PM10	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.60	7.60	0.60	100	5.5	84.0
Potential To Emit (tons/year)	NA	NA	0.04	6.13	0.34	5.15

* PM and PM10 emissions are included in the emission calculation for melting process because the emission factors are the ones for the furnaces.
**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF.
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential throughput (MMCF/year) = Heat input capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

PTE (tons/year) = Potential throughput (MMCF/year) * Emission factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Emissions due to Natural Gas Combustion Only
From Ten (10) Aluminum Melt Furnaces

Company Name: Keihin, IPT Mfg., Inc.
Address: 400 West New Road, Greenfield, Indiana 46140
Title V: 059-16006
Plt ID: 059-00013
Reviewer: ERG/SD
Date: March 23, 2005

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	1.29E-04	7.36E-05	4.60E-03	1.10E-01	2.08E-04

SUM 1.15E-01

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	3.07E-05	6.74E-05	8.58E-05	2.33E-05	1.29E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Particulate Emissions
From Ten (10) Aluminum Melt Furnaces

Company Name: Keihin, IPT Mfg., Inc.
Address: 400 West New Road, Greenfield, Indiana 46140
Title V: 059-16006
Plt ID: 059-00013
Reviewer: ERG/SD
Date: March 23, 2005

Emission Unit Description	Unit ID	Maximum Throughput Rate (lb/hour)	(ton/hour)	E.F PM (lb/ton)	E.F PM10 (lb/ton)	E.F VOC (lb/ton)	PTE of PM before control (tons/year)	PTE of PM10 before control (tons/year)	PTE of VOC (tons/year)	**Control Efficiency (%)	Control Description	PTE of PM after control (tons/year)	PTE of PM10 after control (tons/year)	PTE of PM before control (lb/hour)	** Particulate Emission Limit (lb/hour)
Furnace 1	Unit 1 A	2500	1.25	4.3	2.6	0.2	23.5	14.2	1.10	85%	Wet Scrubber	3.53	2.14	5.38	4.76
Furnace 2	Unit 1 A	2500	1.25	4.3	2.6	0.2	23.5	14.2	1.10	85%	Wet Scrubber	3.53	2.14	5.38	4.76
Furnace 4	Unit 1 B	1100	0.55	4.3	2.6	0.2	10.4	6.3	0.48	0%	NA	10.4	6.3	2.37	2.75
Furnace 5	Unit 1 B	1100	0.55	4.3	2.6	0.2	10.4	6.3	0.48	0%	NA	10.4	6.3	2.37	2.75
Furnace 6	Unit 1 B	1100	0.55	4.3	2.6	0.2	10.4	6.3	0.48	0%	NA	10.4	6.3	2.37	2.75
Furnace 7	Unit 1 B	1100	0.55	4.3	2.6	0.2	10.4	6.3	0.48	0%	NA	10.4	6.3	2.37	2.75
Furnace 8	Unit 1 B	1100	0.55	4.3	2.6	0.2	10.4	6.3	0.48	0%	NA	10.4	6.3	2.37	2.75
Furnace 3	HPDC 3	1100	0.55	4.3	2.6	0.2	10.4	6.3	0.48	95%	Baghouse (EF-120)	0.52	0.31	2.37	2.75
Furnace 9	Unit 9	1500	0.75	4.3	2.6	0.2	14.1	8.54	0.66	95%	Baghouse (EF-120)	0.71	0.43	3.23	3.38
Furnace 10	Unit 10	1500	0.75	4.3	2.6	0.2	14.1	8.54	0.66	95%	Baghouse (EF-120)	0.71	0.43	3.23	3.38
Fluxing: Chlorination		9.60	0.005	1000	532	0.0	21.0	11.2	0.00	85%	Wet Scrubber	3.15	1.68	4.80	0.11

Emission factor for PM & PM10 is from AP-42, Table 12.8-2, SCC 3-04-001-03 for Secondary Aluminum Operations, Reverbatory Furnace (1995).
Emission factor for VOC is from and FIRE, Industrial Processes - Aluminum (SCC 3-04-001-03).
Emission factor for fluxing: chlorination is from FIRE, Industrial Processes - Aluminum (SCC 3-04-001-04).

** Pariculate Emission Limit was calculated using the 326 IAC 6-3 Process Weight Rule.

METHODOLOGY
Maximum throughput (tons/hour) = Maximum throughput (lbs/hour) * 1ton/2000 lbs
PTE before control (tons/year) = Maximum throughput (tons/hour) * Emission factor (lb/ton) * 1ton/2000 lbs * 8760 hours/year
PTE before control (lbs/hour) = Maximum throughput (tons/hour) * Emission factor (lb/ton)
PTE after control (tons/year) = Maximum throughput (tons/hour) * Emission factor (lb/ton) * 1ton/2000 lbs * 8760 hours/year * (1- Control efficiency %)

Appendix A: Emission Calculations
Aluminum Facilities (Unit 2)

Company Name: Keihin, IPT Mfg., Inc.
Address: 400 West New Road, Greenfield, Indiana 46140
Title V: 059-16006
Plt ID: 059-00013
Reviewer: ERG/SD
Date: March 23, 2005

POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR

Emission Units	Maximum Throughput		PM Emission Factor	PTE of PM	PM10 Emission Factor	PTE of PM10	SO_2 Emission Factor	PTE of SO_2	NOx Emission Factor	PTE of NOx	VOC Emission Factor	PTE of VOC
	(lbs/hour)	(tons/hour)	(lbs/ton)	(tons/year)	(lb/ton)	(tons/year)	(lb/ton)	(tons/year)	(lb/ton)	(tons/year)	(lb/ton)	(tons/year)
11 Shell Core Machines	2508	1.25	1.10	6.04	1.10	6.04	0.32	1.76	0.50	2.75	0.00	0.00
20 Die Casting Machines	15025	7.51	0.18	5.92	0.18	5.92	0.00	0.00	0.00	0.00	0.00	0.00
9 Knockout Machines	8775	4.39	3.20	61.5	2.24	43.0	0.00	0.00	0.00	0.00	1.2	23.1
TOTAL				**73.5**		**55.0**		**1.76**		**2.75**		**23.1**

Emission factor for Shell Core Machines from FIRE, Industrial Processes - Grey Iron Foundries (SCC 3-04-003-70) and AP-42, Table 12.10-7 (SCC 3-04-003-19)
There is no emission factor for die-casting. Therefore, emission factor of 0.18 lb/ton was taken from an air permit for a clean aluminum processing facility in Kentucky to derive a worst case scenario.
Emission factor for Knockout Machines from FIRE, Industrial Processes - Grey Iron Foundries (SCC 3-04-003-31)

METHODOLOGY
Maximum throughput (tons/hour) = Maximum throughput (lbs/hour) * 1ton/2000 lbs
PTE before control (tons/year) = Maximum throughput (tons/hour) * Emission factor (lb/ton) * 1ton/2000 lbs * 8760 hours/year

POTENTIAL TO EMIT AFTER CONTROLS IN TONS PER YEAR

Emission Units	Control Efficiency %	PTE of PM	PTE of PM10	PTE of SO_2	PTE of NOx
		(tons per year)			
11 Shell Core Machines	99%	1.21	1.21	1.76	2.75
20 Die Casting Machines	99%	1.18	1.18	0.00	0.00
9 Knockout Machines	99%	12.3	8.6	0.00	0.00
TOTAL		**14.7**	**11.0**	**1.76**	**2.75**

Control = Three (3) Baghouses and Ten (10) Dust Collectors with 99 percent efficiency

METHODOLOGY
PTE after control (tons/year) = Maximum throughput (tons/hour) * Emission factor (lb/ton) * 1ton/2000 lbs * 8760 hours/year * (1- Control efficiency %)

Material	Max.Usage Rate (gallons/hour)	Density (lbs/gal)	VOC Content %	PTEof VOC (lbs/hour)	PTE of VOC (tons/year)
Injector Lube	0.05	0.97	30%	0.01	0.06
TOTAL					**0.06**

METHODOLOGY
PTE VOC (lbs/hour) = Maximum Usage Rate (gal/hour) * Density (lb/gal) * VOC content %
PTE VOC (tons/year) = Maximum usage rate (gal/hour) * Density (lb/gal) * VOC content (%) * 1ton/2000 lbs * 8760 hours/year

Appendix A: Emission Calculations
PM/PM10 Emissions
From Shot Blasting (Units 3 and 5)

Company Name: Keihin, IPT Mfg., Inc.
Address: 400 West New Road, Greenfield, Indiana 46140
Title V: 059-16006
Plt ID: 059-00013
Reviewer: ERG/SD
Date: March 23, 2005

Material	Max. Throughput Rate (lb/hour)	* Emission Factor (lb/ton) PM	PM10	PTE of PM (ton/year)	PTE of PM10 (ton/year)
Zinc Shot Blast	3.88	17	1.7	0.14	0.014
Glass Bead Blast	1.37	17	1.7	0.05	0.005
				0.20	**0.02**

Emission factor for Shotblasting is from FIRE, Chapter 14, Grey Iron Foundries (SCC 3-04-003-40)

METHODOLOGY
PTE of PM/PM10 (tons/year) = Max. throughput rate (lb/hour) * 1 ton/2000 lbs * Emission factor (lb/ton) * 8760 hours/year * 1ton/2000 lbs

Appendix A: Emission Calculations
VOC Emissions
From Machining and Washing Process (Unit 4)

Company Name: Keihin, IPT Mfg., Inc.
Address: 400 West New Road, Greenfield, Indiana 46140
Title V: 059-16006
Plt ID: 059-00013
Reviewer: ERG/SD
Date: March 23, 2005

Emission Unit	Density (lbs/gal)	Max. Usage Rate (gal/hour)	Volatile Content (%)	PTE of VOC (tons/year)
Maching and Washing	6.42	1.35	100%	38.0
TOTAL				**38.0**

* Machining and washing operation has a Durr thermal oxidizer as control with 85 % destruction efficiency

METHODOLOGY
PTE of VOC (tons/year) = Density (lbs/gal) * Max. usage rate (gal/hour) * Volatile content (%) * 1 ton/2000 lb * 8760 hours/year

Appendix A: Emission Calculations
VOC Emissions
From Degreasing Operation

Company Name: Keihin, IPT Mfg., Inc.
Address: 400 West New Road, Greenfield, Indiana 46140
Title V: 059-16006
Plt ID: 059-00013
Reviewer: ERG/SD
Date: March 23, 2005

Emission Unit	Density (lb/gal)	Max. Solvent Consumption (gal/hour)	Max. Usage Rate (tons/year)	Volatile Content (%)	PTE of VOC (tons/year)
Degreasing	8.70	0.017	0.63	100%	0.63
TOTAL					**0.63**

METHODOLOGY
Maximum usage rate (tons/year) = Maximum solvent consumption (gal/hour) * Density (lb/gal) * 8760 hours/year * 1 ton/2000 lbs
PTE of VOC (tons/year) = Maximum solvent consumption (gal/hour) * Density (lb/gal) * 8760 hours/year * 1 ton/2000 lbs * Volatile Content (%)

Appendix A: Emission Calculations
Summary

Company Name: Keihin, IPT Mfg., Inc.
Address: 400 West New Road, Greenfield, Indiana 46140
Title V: 059-16006
Plt ID: 059-00013
Reviewer: ERG/SD
Date: March 23, 2005

POTENTIAL TO EMIT BEFORE CONTROLS

Emission Units	PM	PM10	SO_2	NOx	VOC	CO
2 Natural Gas-Fired Boilers	0.70	0.70	0.05	9.16	0.50	7.70
10 Aluminum Melt Furnaces	137	83.1	0.04	6.13	6.73	5.15
Fluxing: chlorination	21.0	11.2				
Aluminum Facilities (Unit 2) consisting of						
11 Shell Core Machines	6.04	6.04	1.76	2.75		
20 Die Casting Machines	5.92	5.92				
9 Knockout Machines	61.5	43.0			23.1	
Injector Lube					0.06	
Shot Blasting (Units 3 and 5)	0.20	0.02				
Machining and Washing Process (Unit 4)					38.0	
Degreasing					0.63	
Miscellaneous Brake Cleaners					7.57	
TOTAL	**233**	**150**	**1.85**	**18.0**	**76.5**	**12.8**

Note 2: HAPs estimates were provided by the source. Worst case cleaning solvents and brake cleaners were inventoried and the maximum HAP content taken to derive the HAP estimates as shown below, except for HCl which results from fluxing in the aluminum furnaces.

HAPs	PTE (tons/year)
Hydrogen Chloride (HCl)	16.9
Hydrogen Fluoride (HF)	0.13
Perchloroethylene	5.00
Methyl Ethyl Ketone (MEK)	2.44
HAPs from Natural Gas Combustion in Boilers	0.17
HAPs from Natural Gas Combustion in Furnaces	0.12
TOTAL	**24.8**