

Shinichi Iizuka  
TOA (USA), Inc.  
1923 Crown Plaza Boulevard  
Plainfield, Indiana 46168

Dear Mr. Iizuka:

Re: Exempt Construction and Operation Status,  
109-16591-00053

The application from TOA (USA), Inc., received on September 19, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following emission units, to be located at Highway 67 South, Mooresville, Indiana, is classified as exempt from air pollution permit requirements:

- (a) Two (2) metal stamping presses.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

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

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

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

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for an Exemption

### Source Background and Description

**Source Name:** TOA (USA), LLC  
**Source Location:** Highway 67 South, Mooresville, Indiana  
**County:** Morgan  
**SIC Code:** 3465  
**Operation Permit No.:** 109-16591-00053  
**Permit Reviewer:** Madhurima D. Moulik

The Office of Air Management (OAM) has reviewed an application from TOA (USA), LLC relating to the construction and operation of a facility for manufacturing various metal automotive components and assemblies.

### New Emission Units and Pollution Control Equipment

The source consists of the following new facilities/units:

- (a) Two (2) metal stamping presses.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registration No. 109-12538-00053, issued on October 13, 2000.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

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

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

An application for the purposes of this review was received on September 19, 2002.

### Emission Calculations

Metal Presses:

This operation has negligible emissions, at 0.001 lb of PM/PM-10 per ton of metal pressed.

**Potential To Emit of New Units**

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

Pollutant	Potential To Emit (tons/year)
PM	Negligible
PM-10	Negligible
SO <sub>2</sub>	-
VOC	-
CO	-
NOx	-
HAPs	-

- (a) The potential to emit of all criteria pollutants is negligible. Therefore, pursuant to 326 IAC 2-1.1-3(d), an Exemption will be issued for the new emission units.

**County Attainment Status**

The source is located in Morgan County.

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

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

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to the metal presses.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326

IAC 14 and 40 CFR Part 63) applicable to the metal presses.

**State Rule Applicability - Entire Source**

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

**Conclusion**

The construction and operation of the two (2) metal presses shall be subject to the conditions of the attached proposed Exemption No. 109-16591-00053.