



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

July 29, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Precision Products Group, Inc. / MSOP 003-17537-00275

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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. 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.

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  
FNPER.dot 9/16/03



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## MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Precision Products Group, Inc. – Paramount Tube Division  
1430 Progress Road  
Fort Wayne, Indiana 46808**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 003-17537-00275	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 29, 2004  Expiration Date: July 29, 2009

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary paper coating and processing operation.

Authorized Individual:	General Manager
Source Address:	1430 Progress Road, Fort Wayne, Indiana 46808
Mailing Address:	P.O. Box 80400, Fort Wayne, Indiana 46898
General Source Phone:	260-484-4111
SIC Code:	2670
County Location:	Allen
Source Location Status:	Nonattainment area for ozone under the 8-hour standard Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD, Emission Offset Rules and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) paper coating operation, consisting of the following equipment:

Four (4) dip tanks, identified as T1, T2, T3 and T4, each installed in 1974, each coating a maximum of 200 pounds of paper per hour, and all exhausting to one (1) stack, identified as E4.
- (b) Thirteen (13) natural gas fired HVAC units, identified as one (1) through thirteen (13), with the following ratings: one (1) at 0.35 MMBtu/hr, one (1) at 0.40 MMBtu/hr, one (1) at 1.35 MMBtu/hr, three (3) at 1.5 MMBtu/hr, one (1) at 2.05 MMBtu/hr, four (4) at 2.5 MMBtu/hr, and two (2) at 3.5 MMBtu/hr, respectively.
- (c) Six (6) natural gas fired ovens, identified as OV1 through OV6, with the following ratings: OV1 – OV4, each rated at 0.80 MMBtu/hr, OV5, rated at 4.0 MMBtu/hr, and OV6 rated at 0.40 MMBtu/hr.
- (d) One (1) natural gas fired dock furnace rated at 0.40 MMBtu/hr.
- (e) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trip material recovery device such as a bag filter or cyclone:
  - (1) Winder/cutter with baghouse (DV2);
  - (2) Three (3) printer/tube cutters with dust collector (DV5);
  - (3) Bandsaw (maintenance) with dust collector (DV4); and
  - (4) Four (4) bandsaws with cyclone/dust collector (DV1 and 1A).
- (f) Other The following activities with PM emissions less than one (1) pound per hour:
  - (1) Three (3) slitters with trim separators;

- (2) Five (5) winders with no cutters;
  - (3) Seven (7) winders with one (1) cutter; and
  - (4) Ten (10) winders associated with one (1) cutter unit.
- (g) Cleaning and Solvent usage.

## **SECTION B GENERAL CONDITIONS**

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

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

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

### **B.2 Definitions**

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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 2-1.1-1 shall prevail.

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

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

### **B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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This permit 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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

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All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.7 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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 (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.
- (c) A copy of the PMP's 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 PMP 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 that unit.

**B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) 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, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (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, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) 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, at reasonable times, 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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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

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

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

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
  
- (b) 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.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source
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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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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 by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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 an "authorized individual" 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 14-10-1, 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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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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

### C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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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.

## Record Keeping and Reporting Requirements

### C.9 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

### C.10 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (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 when operation begins.

### C.11 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period.

The report does not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (d) 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.

## **SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS**

### **Emissions Unit Description:**

One (1) paper coating operation, consisting of the following equipment:

Four (4) dip tanks, identified as T1, T2, T3 and T4, each installed in 1974, each coating a maximum of 200 pounds of paper per hour, and all exhausting to one (1) stack, identified as E4.

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

### **Emission Limitations and Standards**

#### **D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-3]**

Any change or modification, for the four (4) dip tanks, identified as T1, T2, T3 and T4, which would lead to an increase in the source wide potential VOC emissions to 100 tons per year, shall obtain prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-3, before such change can occur.

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

#### **D.1.2 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken annually and shall be complete and sufficient to establish compliance with the VOC statement made in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each period.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and
- (2) The total VOC usage for each year.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trip material recovery device such as a bag filter or cyclone:

- (1) Winder/cutter with baghouse (DV2);
- (2) Three (3) printer/tube cutters with dust collector (DV5);
- (3) Bandsaw (maintenance) with dust collector (DV4); and
- (4) Four (4) bandsaws with cyclone/dust collector (DV1 and 1A). A woodworking shop equipped with one (1) baghouse for particulate control.

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

### Emission Limitations and Standards

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

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- (a) 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.
- (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) 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.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Precision Products Group, Inc. – Paramount Tube Division</b>
<b>Address:</b>	<b>1430 Progress Road</b>
<b>City:</b>	<b>Fort Wayne</b>
<b>Phone #:</b>	<b>260-484-4111</b>
<b>MSOP #:</b>	<b>003-17537-00275</b>

I hereby certify that Precision Products Group, Inc. is  still in operation.  
 no longer in operation.

I hereby certify that Precision Products Group Inc. is:  
 in compliance with the requirements of MSOP 003-17537-00275.  
 not in compliance with the requirements of MSOP 003-17537-00275.

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

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

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

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_ OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: Precision Products Group, Inc. \_\_\_\_\_ PHONE NO. (260)484-4111

LOCATION: Fort Wayne, Allen County \_\_\_\_\_

PERMIT NO. 003-17537 \_\_\_\_\_ AFS PLANT ID: 003-00275 \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/19\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/19\_\_\_\_ \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions**

**applicable to Rule 326 IAC 1-6 and to qualify for  
the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Precision Products Group, Inc. - Paramount Tube Division</b>
<b>Source Location:</b>	<b>1430 Progress Road, Fort Wayne, Indiana 46808</b>
<b>County:</b>	<b>Allen</b>
<b>SIC Code:</b>	<b>2670</b>
<b>Operation Permit No.:</b>	<b>T003-8364-00275</b>
<b>Operation Permit Issuance Date:</b>	<b>December 31, 1998</b>
<b>MSOP No.:</b>	<b>003-17537-00275</b>
<b>Permit Reviewer:</b>	<b>Linda Quigley/EVP</b>

The Office of Air Quality (OAQ) has reviewed an application from Precision Products Group, Inc. relating to the transition from a Part 70 Permit to a Minor Source Operating Permit for the operation of a stationary paper coating and processing operation.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) paper coating operation, consisting of the following equipment:
  - Four (4) dip tanks, identified as T1, T2, T3 and T4, each installed in 1974, each coating a maximum of 200 pounds of paper per hour, and all exhausting to one (1) stack, identified as E4.
- (b) Thirteen (13) natural gas fired HVAC units, identified as one (1) through thirteen (13), with the following ratings: one (1) at 0.35 MMBtu/hr, one (1) at 0.40 MMBtu/hr, one (1) at 1.35 MMBtu/hr, three (3) at 1.5 MMBtu/hr, one (1) at 2.05 MMBtu/hr, four (4) at 2.5 MMBtu/hr, and two (2) at 3.5 MMBtu/hr, respectively.
- (c) Six (6) natural gas fired ovens, identified as OV1 through OV6, with the following ratings: OV1 – OV4, each rated at 0.80 MMBtu/hr, OV5, rated at 4.0 MMBtu/hr, and OV6 rated at 0.40 MMBtu/hr.
- (d) One (1) natural gas fired dock furnace rated at 0.40 MMBtu/hr.
- (e) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trip material recovery device such as a bag filter or cyclone:
  - (1) Winder/cutter with baghouse (DV2);
  - (2) Three (3) printer/tube cutters with dust collector (DV5);
  - (3) Bandsaw (maintenance) with dust collector (DV4); and
  - (4) Four (4) bandsaws with cyclone/dust collector (DV1 and 1A).
- (f) The following activities with PM emissions less than one (1) pound per hour:
  - (1) Three (3) slitters with trim separators;

- (2) Five (5) winders with no cutters;
- (3) Seven (7) winders with one (1) cutter; and
- (4) Ten (10) winders associated with one (1) cutter unit.

(g) Cleaning and Solvent usage.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **Existing Approvals**

The source has been operating under previous approvals including, but no limited to, the following:

- (a) Title V, T003-8364-00275, issued on December 31, 1988; and
- (b) First Permit Reopening, R003-13143-00275, issued on October 1, 2001.

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 MSOP:

- (a) All conditions relating to the one (1) dip tank, identified as T5, have been removed.

*Reason not incorporated:* The one (1) dip tank, identified as T5, was taken out of service in 2001 and removed from the building.

- (b) All conditions as required by the Part 70 Permit Program have been removed.

*Reason not incorporated:* This source is no longer subject to the Part 70 Program. The potential to emit of all criteria pollutants is less than 100 tons per year and the potential to emit of single HAP and combination of HAPs is less than 10 tons and 25 tons per year, respectively. Therefore, this source is transitioning to a Minor Source Operating Permit and Part 70 requirements are not applicable.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the 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 March 21, 2003, with additional information received on March 30, 2004 and April 20, 2004.

### Emission Calculations

See Appendix A of this document for detailed emission calculations, pages one (1) through six (6).

### Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	78.45
PM-10	79.29
SO <sub>2</sub>	0.09
VOC	62.61
CO	12.38
NO <sub>x</sub>	14.74

HAPs	Potential to Emit (tons/yr)
Methanol	Less than 10
Toluene	Less than 10
MEK	Less than 10
Total	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM10 and VOC are greater than twenty-five (25) tons per year but are less than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

### County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Non-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. Allen County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

- (b) Allen 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. 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.

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	not reported
PM-10	0.00
SO <sub>2</sub>	0.00
VOC	4.02
CO	0.02
NO <sub>x</sub>	0.12
Single HAP	not reported
Combination HAPs	not reported

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater. This source is not in one of the 28 listed source categories.
- (b) These emissions were based on the 2001 OAQ emission data.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 003-17537-00275, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on information provided by the source. The source states that it changed its coating materials to those which contain low VOC and no HAPs (see Appendix A for emission calculations). Therefore, based on the potential to emit of criterial pollutants, the source will transition from a Part 70 permit to a Minor Source Operating Permit.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Paper and Other Web (Surface Coating), 40 CFR 63.3280 (Subpart JJJJ). The provisions of this Subpart apply to each new and existing facility that is a major source of HAP, as defined in 40 CFR 63.2, Subpart A, at which web coating lines are operated. All the coating lines for this source are web coating lines however, the source changed the coating materials in 2002 to materials with no HAPs. Therefore, this source is no longer a major source of HAP, as defined in 40 CFR 63.2, Subpart A, and the requirements of this rule shall not apply.
- (c) The degreasing operations are not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T). Subpart T applies to degreasing operations using one of six listed halogenated solvents, or any combination of the solvents in a concentration greater than 5 percent by weight, as a cleaning or drying agent. The source does not use the regulated halogenated solvents in the degreasing operations; therefore, Subpart T does not apply.

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-4.1-1 (New Source Toxics Control)**

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any source that constructs or reconstructs a major source of HAPs, which has the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs, must control emissions from that source using technologies consistent with the Maximum Achievable Control Technology (MACT). This source has potential single HAP and total HAP emissions of less than 10 and 25 tons per year, respectively, therefore, this rule does not apply.

#### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)**

This source is not subject to the requirements of these rules. As shown in the Potential to Emit Table, the uncontrolled potential emissions of all regulated pollutants are less than 100 tons per year. The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as non-attainment. Since this source is located in Allen County which has been designated as a non-attainment area for ozone (effective June 15, 2004), the applicability threshold for 326 IAC 2-3 (Emission Offset) is 100 tons per year for VOC. Therefore the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) do not apply.

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

This source is located in Allen County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### **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 the 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.

### **State Rule Applicability – Individual Facilities**

#### 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-1(b)(5), the four (4) dip tanks, identified as T1, T2, T3 and T4, are not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).
  
- (b) The following units each have a process weight rate of less than 100 pounds per hour and each have particulate allowable emissions of 0.551 pounds per hour:
  - (1) Winder/cutter with baghouse (DV2);
  - (2) Three (3) printer/tube cutters with dust collector (DV5);
  - (3) Bandsaw (maintenance) with dust collector (DV4); and
  - (4) Four (4) bandsaws with cyclone/dust collector (DV1 and 1A).

#### 326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more. The four (4) dip tanks, identified as T1, T2, T3 and T4, were each constructed in 1974, therefore 326 IAC 8-1-6 does not apply.

#### 326 IAC 8-2-5 (Paper Coating Operations)

The four (4) dip tanks, identified as T1, T2, T3 and T4, are not subject to 326 IAC 8-2-5 (Paper Coating Operations) because they were constructed prior to the applicability date of January 1, 1980, and the source is not located in one of the listed counties.

#### 326 IAC 8-3-2 (Cold Cleaner Operations)

The cleaning/solvent operations are not subject to 326 IAC 8-3-2 because they were constructed in 1974, before the rule applicability date.

#### 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cleaning/solvent operations are not subject to 326 IAC 8-3-2 because they were constructed in 1974, before the rule applicability date.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

The four (4) dip tanks, identified as T1, T2, T3 and T4, each constructed in 1974, are not subject to 326 IAC 8-6. This source commenced operation prior to the applicability date of October 7, 1974. Therefore, 326 IAC 8-6 does not apply.

### **Conclusion**

The operation of this stationary paper coating and processing operation shall be subject to the conditions of the Minor Source Operating Permit 003-17537-00275.

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

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

<b>Source Name:</b>	<b>Precision Products Group, Inc. – Paramount Tube Division</b>
<b>Initial Source Location:</b>	<b>1430 Progress Road, Fort Wayne, Indiana 46808</b>
<b>County:</b>	<b>Allen</b>
<b>SIC Code:</b>	<b>2670</b>
<b>Operation Permit No.:</b>	<b>T003-8364-00275</b>
<b>Operation Permit Issuance Date:</b>	<b>December 31, 1998</b>
<b>MSOP No.:</b>	<b>003-17537-00275</b>
<b>Permit Reviewer:</b>	<b>Linda Quigley/EVP</b>

On June 15, 2004, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Precision Products Group, Inc. – Paramount Tube Division had applied for a transition from a Part 70 Permit to a Minor Source Operating Permit (MSOP) for the operation of a stationary paper coating and processing operation. The notice also stated that OAQ proposed to issue a MSOP 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.

Upon further review, the OAQ has decided to make the following changes to the MSOP. Bolded language has been added and the language with a line through it has been deleted.

- On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Allen County has been designated as nonattainment for the 8-hour ozone standard. The 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.

**County Attainment Status**

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
<b>1-hour Ozone</b>	<del>nonattainment</del>
<b>8-hour Ozone</b>	<b>basic nonattainment</b>
CO	attainment
Lead	attainment

- ~~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. Allen County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.~~

**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. Elkhart 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) Allen 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. 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.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary paper coating and processing operation.

Authorized Individual:	General Manager
Source Address:	1430 Progress Road, Fort Wayne, Indiana 46808
Mailing Address:	P.O. Box 80400, Fort Wayne, Indiana 46898
General Source Phone:	260-484-4111
SIC Code:	2670
County Location:	Allen
Source Location Status:	Nonattainment area for ozone <b>under the 8-hour standard</b> Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD, <del>and</del> Emission Offset Rules, <b>and Nonattainment NSR;</b> Minor Source, Section 112 of the Clean Air Act

## Appendix A: Emission Calculations

**Company Name:** Precision Products Group, Inc.  
**Address City IN Zip:** 1430 Progress Road, P.O. 80400, Fort Wayne, Indiana, 46808  
**MSOP:** 003-17537-00275  
**Plt ID:** 003-00275  
**Reviewer:** LQ/EVP  
**Application Rec.:** March 21, 2003

<b>Uncontrolled Potential Emissions (tons/year)</b>					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Surface Coating Dip Tanks	Solvent Usage	Trimmers and Cutters	<b>TOTAL</b>
PM	0.28	0.00	0.00	78.17	78.45
PM10	1.12	0.00	0.00	78.17	79.29
SO2	0.09	0.00	0.00	0.00	0.09
NOx	14.74	0.00	0.00	0.00	14.74
VOC	0.81	59.18	2.04	0.00	62.61
CO	12.38	0.00	0.00	0.00	12.38
total HAPs	negl.	0.00	0.58	0.00	0.58
worst case single HAP	negl.	0.00	0.30	0.00	0.30
			(methanol)		
Total emissions based on rated capacity at 8,760 hours/year.					
<b>Controlled Potential Emissions (tons/year)</b>					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Surface Coating Dip Tanks	Solvent Usage	Trimmers and Cutters	<b>TOTAL</b>
PM	0.28	0.00	0.00	0.02	0.30
PM10	1.12	0.00	0.00	0.02	1.14
SO2	0.09	0.00	0.00	0.00	0.09
NOx	14.74	0.00	0.00	0.00	14.74
VOC	0.81	59.18	2.04	0.00	62.61
CO	12.38	0.00	0.00	0.00	12.38
total HAPs	negl.	0.00	0.58	0.00	0.58
worst case single HAP	negl.	0.00	0.30	0.00	0.30
			(methanol)		
Total emissions based on rated capacity at 8,760 hours/year, after control.					

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

**Company Name: Precision Products Group, Inc.  
Address City IN Zip: 1430 Progress Road, P.O. 80400, Fort Wayne, Indiana, 46808  
MSOP: 003-17537-00275  
Pit ID: 003-00275  
Reviewer: LQ/EVP  
Application Rec.: March 21, 2003**

**VOC and Particulate Emissions**

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
<b>Varnish</b>																
Ranbar B7373-6 (T1)	8.50	27.64%	0.00%	27.64%	0.00%	0.00%	0.08	17.75	2.35	2.35	3.38	81.07	14.79	0.00	n/a	100.00%
Ranbar B7373-6 (T2)	8.50	27.64%	0.00%	27.64%	0.00%	0.00%	0.08	17.75	2.35	2.35	3.38	81.07	14.79	0.00	n/a	100.00%
Ranbar B7373-6 (T3)	8.50	27.64%	0.00%	27.64%	0.00%	0.00%	0.08	17.75	2.35	2.35	3.38	81.07	14.79	0.00	n/a	100.00%
Ranbar B7373-6 (T4)	8.50	27.64%	0.00%	27.64%	0.00%	0.00%	0.08	17.75	2.35	2.35	3.38	81.07	14.79	0.00	n/a	100.00%

**Potential Emissions**

**13.51      324.27      59.18      0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

**Appendix A: Emissions Calculations  
Degreasing Operations**

**Company Name: Precision Products Group, Inc.  
Address City IN Zip: 1430 Progress Road, P.O. 80400, Fort Wayne, Indiana, 46808  
MSOP: 003-17537-00275  
Plt ID: 003-00275  
Reviewer: LQ/EVP  
Application Rec.: March 21, 2003**

**VOC and Particulate Emissions**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Superior Solvents	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.03139	6.62	6.62	0.21	4.99	0.91	0.00	100%
Superior Solvents	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.01256	7.09	7.09	0.09	2.14	0.39	0.00	100%
Superior Solvents	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.01256	7.09	7.09	0.09	2.14	0.39	0.00	100%
Superior Solvents	6.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.01256	6.30	6.30	0.08	1.90	0.35	0.00	100%

**State Potential Emissions**

**0.47                      11.16                      2.04                      0.00**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/hour)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/hour) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/hour) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (gal/hour) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

**HAP Emissions**

Material	Density (Lb/Gal)	Gal of Mat (gal/hour)	Weight % Methanol	Weight % Toluene	Weight % MEK	Methanol Emissions ton/yr	Toluene Emissions ton/yr	MEK Emissions ton/yr
Superior Solvents	6.6	0.03	0.00%	0.00%	14.20%	0.00	0.00	0.13
Superior Solvents	7.1	0.01	0.00%	76.60%	0.00%	0.00	0.30	0.00
Superior Solvents	7.1	0.01	0.00%	0.00%	0.00%	0.00	0.00	0.00
Superior Solvents	6.3	0.01	44.90%	0.00%	0.00%	0.16	0.00	0.00

**Total Potential Emissions**

**0.16                      0.30                      0.13**

**Total HAPs (tons/yr) 0.58**

**METHODOLOGY**

HAPs emission rate (tons/year\*) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Process Particulate Emissions**

**Company Name:** Precision Products Group, Inc.  
**Address City IN Zip:** 1430 Progress Road, P.O. 80400, Fort Wayne, Indiana, 46806  
**MSOP:** 003-17537-00275  
**Plt ID:** 003-00275  
**Reviewer:** LQ/EVP  
**Application Rec.:** March 21, 2003

<b>Uncontrolled Potential Emissions (tons/year)</b>						
<b>A. Baghouses</b>						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (tons/yr)
DV1	1	0.00009	7.8	383	99.98%	52.07
DV2	1	0.00012	10.7	112	99.98%	26.09
DV5	1	0.00017	8.9	135	99.97%	26.13
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						<b>78.17</b>
<b>Controlled Potential Emissions (tons/year)</b>						
<b>A. Baghouses</b>						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (tons/yr)
DV1	1	0.00009	7.8	383	99.98%	0.01
DV2	1	0.00012	10.7	112	99.98%	0.01
DV5	1	0.00017	8.9	135	99.97%	0.01
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source control:						<b>0.02</b>

Methodology:

Potential (uncontrolled):

Baghouse (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs \* 1/(1-Control Efficiency)

Potential (controlled):

Baghouse (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs \* 1/(1-Control Efficiency)

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: Precision Products Group, Inc.  
Address City IN Zip: 1430 Progress Road, P.O. 80400, Fort Wayne, Indiana, 46808  
MSOP: 003-17537-00275  
Plt ID: 003-00275  
Reviewer: LQ/EVP  
Application Rec.: March 21, 2003**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

33.65

294.8

Heat Input Capacity includes the following: VHAC units one (1) through thirteen (13), with the following ratings: one @ 0.35 MMBtu/hr, one @ 0.40 MMBtu/hr, one @ 1.35 MMBtu/hr, three @ 1.5 MMBtu/hr, one @ 2.05 MMBtu/hr, four @ 2.50 MMBtu/hr and two @ 3.5 MMBtu/hr. six (6) natural gas fired ovens, OV1 through OV4, each rated at 0.80 MMBtu/hr, OV5, rated at 4.0 MMBtu/hr, OV6, rated at 0.40 MMBtu/hr and one (1) natural gas fired dock furnace rated at 0.40 MMBtu/hr.

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.28	1.12	0.09	14.74	0.81	12.38

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 6 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100**

**HAPs Emissions**

**Company Name: Precision Products Group, Inc.  
 Address City IN Zip: 1430 Progress Road, P.O. 80400, Fort Wayne, Indiana, 46808  
 MSOP: 003-17537-00275  
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**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.095E-04	1.769E-04	1.105E-02	2.653E-01	5.011E-04

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.369E-05	1.621E-04	2.063E-04	5.601E-05	3.095E-04

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.