



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 28, 2005  
RE: ThyssenKrupp / 045-17584-00013  
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 impracticable 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.



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**ThyssenKrupp Gerlach Company  
1291 East 8<sup>th</sup> Street  
Veedersburg, Indiana 47987**

(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.: T045-17584-00013	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 28, 2005  Expiration Date: January 28, 2010



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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 steel and iron forging operation.

Responsible Official:	Plant Manager
Source Address:	1291 East 8th Street, Veedersburg, Indiana 47987
Mailing Address:	1291 East 8th Street, Veedersburg, Indiana 47987
General Source Phone Number:	(765) 294-6202
SIC Code:	3462
County Location:	Fountain
Source Location Status:	Attainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) forging press, identified as FP-1, constructed in 1995, having a maximum throughput of 24,000 lb/hr, using a wet scrubber as control, and exhausting to stack S11.
- (b) One (1) shot blast machine, identified as SC-1, constructed in 1995, using SAE S390 steel shot media, having a maximum throughput of 24,000 lb/hr, with a baghouse used as control, and exhausting to stack S12.
- (c) One (1) die shop shotclean machine, identified as SC-2, having a maximum throughput of 9,000 lb/hr, using a baghouse for control, exhausting to stack S13. Emissions are exhausted inside the building.

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) open top degreasing unit, with a daily usage rate of 0.28 gallons. [326 IAC 8-3-3 and 326 IAC 8-3-6]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, including:
  - (1) One (1) metal inert gas welder, identified as DW-1, using wire type E308, with a maximum hourly consumption of 0.30 pounds of wire. [326 IAC 6-3-2]

- (2) One (1) stick welding, identified as DW-1, using electrode type E308, with six (6) electrodes used per hour. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, consisting of three (3) electrical discharge machining, identified as EDM-1, maximum amount of dies processed is 750 lbs/hr, using a baghouse for control, and exhausting to stack S16. Emissions are exhausted inside the building. [326 IAC 6-3-2]
- (e) Activities with emissions of PM less than five (5) pounds per hour or 25 pounds per day, consisting of three (3) hand grinding steel forging dies, identified as GB 1, GB 2, and GB 3, using a baghouse to control GB 1, and exhausting to stack S15. Emissions are exhausted inside the building. [326 IAC 6-3-2]

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]

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, modifications, or amendments of this permit do not affect the expiration date.

### 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.

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

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

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

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]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (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.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a deviation from any limitation on emissions or potential to emit.
- (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 contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 within a reasonable time.

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, P. O. Box 6015

Indianapolis, Indiana 46206-6015

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) 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.

- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) 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)]
- (h) 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]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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]**

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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]  
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.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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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)]**

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- (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]**

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ, in 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 increases and decreases in emissions in 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.

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

## 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 [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- (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. This condition is not federally enforceable.
- 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 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.
- C.7 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.8 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, 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 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.9 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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.10 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 [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

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

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

in writing, prior to the end of the initial ninety (90) 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.12 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.

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

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- (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 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.
- (b) Whenever a condition in this permit requires the measurement of a 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.

**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]**

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on April 19, 1989.
- (b) 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 source must comply with the applicable requirements of 40 CFR 68.

**C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (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, OAQ

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.
- (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.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (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.

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

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate 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 2-6] [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]**

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- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission 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 emissions 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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

- (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.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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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) Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

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

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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) One (1) forging press, identified as FP-1, constructed in 1995, having a maximum throughput of 24,000 lb/hr, using a wet scrubber as control, and exhausting to stack S11.

(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 6-3-2]  
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the forging press shall not exceed 21.7 lbs/hr pounds per hour when operating at a process weight rate of 24,000 pounds per hour.

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

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

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

where E = rate of emission in pounds per hour;  
and  
P = process weight rate in tons per hour

- D.1.2 PSD Minor Limit [326 IAC 2-2]  
Pursuant to 326 IAC 2-2 (PSD), the emissions of PM and PM10 from the forging press (FP-1) shall be limited to less than 21.7 pounds per hour.

Compliance with this limit and the limits in Conditions D.2.2, D.3.2 and D.4.2 limits the PM and PM10 emissions from the entire source to less than 218.0 tons per year and makes 326 IAC 2-2 (PSD) not applicable.

- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]  
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

- D.1.4 Particulate Control  
Pursuant to CP 045-4286-00013 issued on July 11, 1995, and T043-8115-00013, issued January 19, 1999, and in order to comply with Conditions D.1.1 and D.1.2, the wet scrubber for particulate control shall be in operation and control emissions from the forging press at all times that the forging press is in operation.

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

- D.1.5 Visible Emissions Notations  
(a) Visible emission notations of the forging press stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.

#### D.1.6 Scrubber Operating Condition

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per shift. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.
- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (c) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (d) In the event that a scrubber's failure has been observed:  
  
The affected process will be shut down immediately until the failed unit has been replaced or repaired.

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

#### D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of the once per shift visible emission notations of the forging press stack exhaust.
- (b) To document compliance with Condition D.1.6(a), the Permittee shall maintain once per shift records of the pressure drop and flow rate required under Condition D.1.6(a).
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6(c).
- (d) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) 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) One (1) shot blast machine, identified as SC-1, constructed in 1995, using SAE S390 steel shot media, having a maximum throughput of 24,000 lb/hr, with a baghouse used as control, and exhausting to stack S12.

(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]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the shot blast machine (SC-1) shall not exceed 21.7 pounds per hour when operating at a process weight rate of 24,000 pounds per hour.

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

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

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

#### D.2.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD), the emissions of PM and PM10 from the shot blast machine (SC-1) shall be limited to less than 21.7 pounds per hour.

Compliance with this limit and the limits in Conditions D.1.2, D.3.2 and D.4.2 limits the PM and PM10 emissions from the entire source to less than 218 tons per year and makes the source minor for PSD.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform PM and PM-10 testing for the Shot Blast Machine (SC-1), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

#### D.2.5 Particulate Control

Pursuant to CP 045-4286-00013 issued on July 11, 1995, and T043-8115-00013, issued January 19, 1999, and in order to comply with Conditions D.2.1 and D.2.2, the baghouse for particulate control shall be in operation and control emissions from the shot blast machine (SC-1) at all times that the shot blast machine (SC-1) is in operation.

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

### **D.2.6 Visible Emissions Notations [40 CFR 64]**

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- (a) Visible emission notations of the shot blast machine (SC-1) stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether 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) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.

### **D.2.7 Compliance Assurance Monitoring [40 CFR 64] and Parametric Monitoring**

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The Permittee shall perform the following actions on shot blast machine (SC-1) and its control device according to the schedule indicated as follows:

- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Shot Blast Machine (SC-1), at least once per shift when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 7.0 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, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range 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. The instrument used for determining the pressure 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.
- (b) The Permittee shall inspect filter elements, check manometer readings, check dust disposal mechanism, check dust collector hopper and check elements of differential pressure switch once per week.
- (c) The Permittee shall perform inspections of control box settings of potentiometers, check solenoid valve for proper operation, drain water/oil from reservoir, grease spiral bearings and check gear box for leaks on a biweekly basis.
- (d) The Permittee shall perform adjustments and repairs as dictated by performance, check cabinet doors for leakage, check blast wheel for abnormal wear, lubricate bearings, check abrasive system for proper operation, check diaphragm valves for proper operation and inspect door seals, connecting ducts and fans on a monthly basis.

- (e) The Permittee shall inspect are bags controlling the shot blast machine, check dust collector filter elements for wear and damage, check mechanism and casing for leaks, grease fan bearings, check filter cartridges for dust adherence, check control settings and pulse time of cleaning mechanism, check for oil or water in reservoir, check filter fan wear, check filter fan wear, check hopper wear, check abrasive system pulley and shaft wear, check head and boot shaft seals and bearings, check feed chute wear, check discharge chute wear, check separator bearings and seals, check storage hopper, check for leaks in air lines, cylinders and valves, check diaphragm valves for leaks on a quarterly basis. These quarterly checks shall not be performed in consecutive months.
- (f) The Permittee shall keep spare parts in stock to replace damaged parts. All defective or damaged parts found during the course of the inspections prescribed above shall be repaired or replaced in a timely manner.
- (g) If the Permittee detects failure of the emissions control equipment, the Permittee shall shut down the equipment immediately until the failed units are repaired or replaced..

#### D.2.8 Broken or Failed Bag Detection [40 CFR 64]

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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).

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

##### D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of the once per shift visible emission notations of the shot blast machine (SC-1) stack exhaust.
- (b) To document compliance with Condition D.2.7(a), the Permittee shall maintain records once per shift of the total static pressure drop during normal operation for shot blast machine (SC-1).

- (c) To document compliance with Condition D.2.7(b), (c), (d), and (e), the Permittee shall maintain records of the results of the inspections, adjustments, repairs, and replacement of parts as required under Condition D.2.7.
- (d) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) To document compliance with Condition D.2.4, the Permittee shall keep records of the results of the stack test as required under Condition D.2.4
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (c) One (1) die shop shotclean machine, identified as SC-2, having a maximum throughput of 9,000 lb/hr, using a baghouse for control, exhausting to stack S13. Emissions are exhausted inside the building.

(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 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the die shop shot clean machine (SC-2) shall not exceed 11.2 pounds per hour when operating at a process weight rate of 9,000 pounds per hour.

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

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

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

#### D.3.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD), the emissions of PM and PM10 from the die shop shot clean machine (SC-2) shall be limited to less than 2.13 pounds per hour.

Compliance with this limit and the limits in Conditions D.1.2, D.2.2 and D.4.2 limits the PM and PM10 emissions from the entire source to less than 218 tons per year and makes the source minor for PSD.

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.3.4 Particulate Control

Pursuant to CP 045-4286-00013 issued on July 11, 1995, and T043-8115-00013, issued January 19, 1999, and in order to comply with Conditions D.3.1 and D.3.2, the baghouse for particulate control shall be in operation and control emissions from the shot blast machine (SC-2) at all times that the shot blast machine (SC-2) is in operation.

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

#### D.3.5 Visible Emissions Notations

- (a) Visible emission notations of the shot blast machine (SC-2) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether 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) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.

#### D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the shot blast machine (SC-2), at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 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, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range 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.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, (and local agency if applicable) and shall be calibrated at least once every six (6) months.

#### D.3.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the shot blast machine (SC-2) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.3.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with

respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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).

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

#### **D.3.9 Record Keeping Requirements**

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of the once per shift visible emission notations of the shot blast machine (SC-2) stack exhaust when venting to the atmosphere.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.3.7, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7 and the dates the vents are redirected.
- (d) To document compliance with Condition D.3.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) 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)]: Insignificant Activities

- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, including:
- (1) One (1) metal inert gas welder, identified as DW-1, using wire type E308, with a maximum hourly consumption of 0.30 pounds of wire. [326 IAC 6-3-2]
  - (2) One (1) stick welding, identified as DW-1, using electrode type E308, with six (6) electrodes used per hour. [326 IAC 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, consisting of three (3) electrical discharge machining, identified as EDM-1, maximum amount of dies processed is 750 lbs/hr, using a baghouse for control, and exhausting to stack S16. Emissions are exhausted inside the building. [326 IAC 6-3-2]
- (e) Activities with emissions of PM less than five (5) pounds per hour or 25 pounds per day, consisting of three (3) hand grinding steel forging dies, identified as GB 1, GB 2, and GB 3, using a baghouse to control GB 1, and exhausting to stack S15. Emissions are exhausted inside the building. [326 IAC 6-3-2]

(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.4.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations), the allowable particulate emission rate from the metal inert gas welding and stick welding facilities (DW-1) shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the electrical discharge machining (EDM-1) shall not exceed 2.13 pounds per hour each when operating at a process rate of 750 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the hand grinding steel forging dies (GB1, GB2 and GB3) shall not exceed 2.13 pounds per hour total when operating at a process rate of 750 pounds per hour.

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.4.2 PSD Minor Limit [326 IAC 2-2]**

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- (a) The emissions of PM and PM10 from the Electrical Discharge Machining (EDM-1) shall be limited to less than 2.13 lbs per hour.
- (b) The emissions of PM and PM10 from the three (3) Hand Grinding Steel Forging Dies (GB1, GB2 and GB3) shall be limited to less than 2.13 lbs per hour, total.

Compliance with this limit and the limits in Conditions D.1.2, D.2.2 and D.3.2 limits the PM and PM10 emissions from the entire source to less than 218.0 tons per year and makes 326 IAC 2-2 (PSD) not applicable.

**D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.4.4 Particulate Control**

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Pursuant to CP 045-4286-00013 issued on July 11, 1995, and T043-8115-00013, issued January 19, 1999, and in order to comply with condition D.4.1, the baghouse(s) for particulate control shall be in operation and control emissions from the hand grinding steel forging dies and electrical discharge machining facilities at all times that these facilities are in operation.

**D.4.5 Visible Emissions Notations**

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- (a) Visible emission notations of the electrical discharge machining and hand grinding steel forging dies stack exhausts (S15 and S16) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.

**D.4.6 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the electrical discharge machining and hand grinding steel forging dies, at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 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, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range 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.

The instrument used for determining the pressure 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.4.7 Baghouse Inspections**

An inspection shall be performed each calendar quarter of all bags controlling the electrical discharge machining and hand grinding steel forging dies when venting to the atmosphere. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

**D.4.8 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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).

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

**D.4.9 Record Keeping Requirements**

- (a) To document compliance with Condition D.4.5, the Permittee shall maintain records of visible emission notations of the electrical discharge machining and hand grinding steel forging dies stack exhausts (S15 and S16) once per shift when venting to the atmosphere.
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.4.7, the Permittee shall maintain records of the results of the inspections required under Condition D.4.7.

- (d) To document compliance with Condition D.4.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.5 FACILITY CONDITIONS**

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) open top degreasing unit, daily usage rate is 0.28 gallons. [326 IAC 8-3-3 and 326 IAC 8-3-6]

(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.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]**

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;
- (c) Minimize solvent carry-out by:
  - (1) Racking parts to allow complete drainage;
  - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
  - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
  - (4) Tipping out any pools of solvent on the cleaned parts before removal;
  - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;

- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-6]

Pursuant to 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements), for open top vapor degreasing operations with an air to solvent interface of ten and eight-tenths (10.8) square feet or greater and constructed after July 1, 1990:

- (a) The Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
  - (2) Equip the degreaser with the following switches:
    - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
    - (B) A spray safety switch shuts off spray pump if the vapor level drops more than four (4) inches.
  - (3) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) Equip the degreaser with one (1) of the following control devices:
    - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powdered cover if the degreaser opening is greater than ten and eight-tenths (10.8) square feet; or
    - (B) A refrigerated chiller; or
    - (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser; or
    - (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifty (50) cubic feet per minute per square foot of air to vapor interface area and an average of less than twenty-five parts per million of solvent is exhausted over one (1) complete adsorption cycle; or
    - (E) Other systems of demonstrated equivalent or better control as those outlined in (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The Permittee shall ensure that the following operating requirements are met:
  - (1) Keep the cover closed at all times except when processing workloads through the degreaser;

- (2) Minimize solvent carryout emissions by:
  - (A) Racking articles to allow complete drainage;
  - (B) Moving articles in and out of the degreaser at less than eleven feet per minute;
  - (C) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
  - (D) Tipping out any pools of solvent on the cleaned articles before removal; and
  - (E) Allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood or rope;
- (4) Prohibit occupation of more than one half ( $\frac{1}{2}$ ) of the degreaser's open top area with the workload;
- (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than four (4) inches when the workload is removed;
- (6) Prohibit solvent spraying above the vapor level;
- (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately;
- (8) Store waste solvent only in covered containers and prohibit the disposal transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent (by weight) could evaporate;
- (9) Prohibit the exhaust ventilation rate from exceeding sixty-five cubic feet per minute per square foot of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration (OSHA) requirements;
- (10) Prohibit the use of workplace fans near the degreaser opening;
- (11) Prohibit visually detectable water in the solvent exiting the water separator.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: ThyssenKrupp Gerlach Company  
Source Address: 1291 East 8th Street, Veedersburg, Indiana 47987  
Mailing Address: 1291 East 8th Street, Veedersburg, Indiana 47987  
Part 70 Permit No.: T045-17584-00013

**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  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: ThyssenKrupp Gerlach Company  
Source Address: 1291 East 8th Street, Veedersburg, Indiana 47987  
Mailing Address: 1291 East 8th Street, Veedersburg, Indiana 47987  
Part 70 Permit No.: T045-17584-00013

**This form consists of 2 pages**

**Page 1 of 2**

<p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• 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</li><li>• 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.</li></ul>
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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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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: ThyssenKrupp Gerlach Company  
 Source Address: 1291 East 8th Street, Veedersburg, Indiana 47987  
 Mailing Address: 1291 East 8th Street, Veedersburg, Indiana 47987  
 Part 70 Permit No.: T045-17584-00013

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

<p>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".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

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 for a Part 70 Operating Permit Renewal

#### Source Background and Description

Source Name:	ThyssenKrupp Gerlach Company
Source Location:	1291 East 8th Street, Veedersburg, Indiana 47987
County:	Fountain
SIC Code:	3462
Operation Permit No.:	T045-8115-00013
Operation Permit Issuance Date:	January 19, 1999
Permit Renewal No.:	T045-17584-00013
Permit Reviewer:	ERG/ST

On June 30, 2004, the Office of Air Quality (OAQ) had a notice published in the Fountain County Neighbor, Attica, Indiana, stating that ThyssenKrupp Gerlach Company had applied for a Part 70 Operating Permit Renewal (also known as a Title V Renewal) to operate a stationary steel and iron forging operation with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

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 modified, if applicable, to reflect these changes.

1. 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. Fountain County has been designated as attainment for the 8-hour ozone standard. Section A.1 General Information has been changed as follows:

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 steel and iron forging operation.

Responsible Official:	Plant Manager
Source Address:	1291 East 8th Street, Veedersburg, Indiana 47987
Mailing Address:	1291 East 8th Street, Veedersburg, Indiana 47987
General Source Phone Number:	(765) 294-6202
SIC Code:	3462
County Location:	Fountain
Source Location Status:	<b>Attainment for 8-hour ozone standard</b> Attainment for all <b>other</b> criteria pollutants

Source Status: Part 70 Permit Program  
 Minor Source, under PSD  
 Minor Source, Section 112 of the Clean Air Act

2. Conditions D.1.3, D.2.3, D.3.3 and D.4.3 have been deleted from the permit. The applicable opacity limits are specified in Condition C.2. The numbering of the other conditions in these Sections have been changed to reflect these deletions.

~~D.1.3~~ Opacity Limit

~~Pursuant to CP 045-4286-00013 issued on July 11, 1995, and T043-8115-00013, issued January 19, 1999, the visible emissions shall not exceed 10% opacity.~~

~~D.2.3~~ Opacity Limit

~~Pursuant to CP 045-4286-00013 issued on July 11, 1995, and T043-8115-00013, issued January 19, 1999, the visible emissions shall not exceed 10% opacity.~~

~~D.3.3~~ Opacity Limit

~~Pursuant to CP 045-4286-00013 issued on July 11, 1995, and T043-8115-00013, issued January 19, 1999, the visible emissions shall not exceed 10% opacity.~~

~~D.4.3~~ Opacity Limit

~~Pursuant to CP 045-4286-00013 issued on July 11, 1995, and T043-8115-00013, issued January 19, 1999, the visible emissions shall not exceed 10% opacity.~~

3. Condition D.1.7 has been corrected as follows:

~~D.1.76~~ Scrubber Operating Condition

(a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per shift. The **Compliance Response Plan** ~~Preventive Maintenance Plan~~ for the scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading.

.....

4. Condition D.1.8 has been corrected as follows:

~~D.1.87~~ Record Keeping Requirements

- (a) To document compliance with Condition D.1.6 ~~5~~, the Permittee shall maintain records of the once per shift visible emission notations of the forging press stack exhaust.
- (b) To document compliance with Condition D.1.6(a), the Permittee shall maintain once per shift records of the **pressue drop and flow rate required under Condition D.1.6(a)**.
- (~~bc~~) To document compliance with Condition D.1.76(~~c~~), the Permittee shall maintain records of the results of the inspections required under Condition D.1.76(~~c~~).
- (~~ed~~) To document compliance with Condition D.1.43, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (~~de~~) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

5. IDEM, OAQ has made the following clarifications to the

Quarterly Deviation and Compliance Monitoring 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: ThyssenKrupp Gerlach Company  
Source Address: 1291 East 8th Street, Veedersburg, Indiana 47987  
Mailing Address: 1291 East 8th Street, Veedersburg, Indiana 47987  
Part 70 Permit No.: T045-17584-00013

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

<p>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. <del>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.</del> <b>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.</b> Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

## Indiana Department of Environmental Management Office of Air Quality

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

#### Source Background and Description

Source Name:	ThyssenKrupp Gerlach Company
Source Location:	1291 East 8th Street, Veedersburg, Indiana 47987
County:	Fountain
SIC Code:	3462
Operation Permit No.:	T045-8115-00013
Operation Permit Issuance Date:	January 19, 1999
Permit Renewal No.:	T045-17584-00013
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from ThyssenKrupp Gerlach Company relating to the operation of a stationary steel and iron forging operation.

#### Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) forging press, identified as FP-1, constructed in 1995, having a maximum throughput of 24,000 lb/hr, using a wet scrubber as control, and exhausting to stack S11.
- (b) One (1) shot blast machine, identified as SC-1, constructed in 1995, using SAE S390 steel shot media, having a maximum throughput of 24,000 lb/hr, with a baghouse used as control, and exhausting to stack S12.
- (c) One (1) die shop shotclean machine, identified as SC-2, having a maximum throughput of 9,000 lb/hr, using a baghouse for control, exhausting to stack S13. Emissions are exhausted inside the building.

#### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source 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) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) open top degreasing unit, with a daily usage rate of 0.28 gallons. [326 IAC 8-3-3 and 326 IAC 8-3-6]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, including:

- (1) One (1) metal inert gas welder, identified as DW-1, using wire type E308, with a maximum hourly consumption of 0.30 pounds of wire. [326 IAC 6-3-2]
- (2) One (1) stick welding, identified as DW-1, using electrode type E308, with six (6) electrodes used per hour. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, consisting of one (1) electrical discharge machining, identified as EDM-1, maximum amount of dies processed is 750 lbs/hr, using a baghouse for control, and exhausting to stack S16. Emissions are exhausted inside the building. [326 IAC 6-3-2]
- (e) Activities with emissions of PM less than five (5) pounds per hour or 25 pounds per day, consisting of three (3) hand grinding steel forging dies, identified as GB 1, GB 2, and GB 3, using a baghouse to control GB 1, and exhausting to stack S15. Emissions are exhausted inside the building. [326 IAC 6-3-2]
- (f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (1) Two (2) heaters, identified as FE17 and FE18, fueled by natural gas, with a maximum heating capacity of 0.32 MMBtu/hr each.
  - (2) Two (2) make-up air units, identified as MAU-1 and MAU-2, fueled by natural gas, with a maximum rated capacity of 7.2 MMBtu/hr each.
  - (3) Five (5) natural gas fired AC/heating units, identified as AC-1 through AC-5, with the maximum rated capacities of units AC-2, AC-4, and AC-5 each being 0.120 MMBtu/hr, and the maximum rated capacities of AC-1 and AC-3 each being 0.135 MMBtu/hr.
  - (4) One (1) air rotation unit, identified as ARU-1, fueled by natural gas, with a maximum heating capacity of 3.125 MMBtu/hr.
  - (5) One (1) water heater, identified as WH-1, fueled by natural gas, with a maximum heating capacity of 0.251 MMBtu/hr.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Closed loop heating and cooling systems.
- (i) Noncontact cooling tower systems, consisting of forced and induced draft cooling tower system not regulated under a NESHAP.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

## Existing Approvals

The source has been operating under the previous Part 70 Permit T045-8115-00013, issued on January 19, 1999 and the following amendments and revisions:

- (a) First Administrative Amendment 045-10879-00013, issued on June 1, 1999; and
- (b) First Reopening 045-13291-00013, issued on January 24, 2002.

All terms and conditions of previous approvals were incorporated into this Part 70 Permit.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 permit renewal 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 renewal application for the purposes of this review was received on March 10, 2003. Additional information was received on February 18, 2004.

There was no notice of completeness letter mailed to the source.

**Emission Calculations**

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

**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."

The source was issued a Part 70 Operating Permit on January 19, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Forging Press (FP-1)	95.0	95.0	-	-	-	-	-
Shot Blast Machine (SC-1)	95.0	95.0	-	-	-	-	-
Shot Blast Machine (SC-2)	9.3	9.3	-	-	-	-	-
Insignificant Activities	18.6	18.6	-	-	-	-	-
Natural Gas-fired Heaters	0.63	0.63	-	0.46	7.01	8.34	-

Process/facility	Potential to Emit (tons/year)						
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Total Emissions	218	218	-	0.46	7.01	8.34	-

"-" Emissions are negligible (less than 0.1 tons per year).

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) 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) 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	5
SO <sub>2</sub>	--
VOC	-
CO	--
NO <sub>x</sub>	--
HAP (specify)	--

"-" Emissions data not reported.

**County Attainment Status**

The source is located in Fountain 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. Fountain 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.
- (b) Fountain 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.

- (c) Fugitive Emissions  
Since this type of operation is not one of the 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.

### 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) Compliance Assurance Monitoring

The requirements of Compliance Assurance Monitoring (CAM) are not applicable to the forging press (FP-1) or shot blast machine (SC-2) because neither of these emission units have a potential to emit greater than 100 tons per year of PM10 before controls. This source does have a pollutant-specific emissions unit (the Shot Blast Machine (SC-1)) as defined in 40 CFR 64.1, with the potential to emit before controls equal to or greater than the major source threshold for PM10, and that is subject to an emission limitation or standard for PM10, and that uses a control device as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the Shot Blast Machine (SC-1). The pollutant-specific emission unit is not a "large unit" as described in 40 CFR 64.5.

The CAM Plan for this emissions unit is as follows:

- (1) Particulate emissions from the Shot Blast Machine (SC-1) shall be controlled by a baghouse. The baghouse shall be in operation at all times that the shot blast machine is in operation.
- (2) The monitoring determination methods shall consist of the following and shall be performed according to the following schedule:
  - (A) Once per shift:
    - (1) Visible emission notations of the Shot Blast Machine (SC-1), stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
    - (2) The total static pressure drop across the baghouse controlling Shot Blast Machine (SC-1) shall be recorded once per shift. The Permittee shall maintain the pressure drop across the baghouses in the range of 2.0 to 7.0 inches of water or a range established during the latest stack test. .

- (B) Weekly: inspect filter elements, check manometer readings, check dust disposal mechanism, check dust collector hopper and check elements of differential pressure switch.
  - (C) Biweekly: inspections of control box settings of potentiometers, check solenoid valve for proper operation, drain water/oil from reservoir, grease spiral bearings and check gear box for leaks.
  - (D) Monthly: adjust/repair as dictated by performance, check cabinet doors for leakage, check blast wheel for abnormal wear, lubricate bearings, check abrasive system for proper operation, check diaphragm valves for proper operation and inspect door seals, connecting ducts and fans.
  - (E) Quarterly: inspect all bags controlling the shot blast machine, replace all defective bags, check dust collector filter elements for wear and damage, check mechanism and casing for leaks, grease fan bearings, check filter cartridges for dust adherence, check control settings and pulse time of cleaning mechanism, check for oil or water in reservoir, check filter fan wear, check filter fan wear, check hopper wear, check abrasive system pulley and shaft wear, check head and boot shaft seals and bearings, check feed chute wear, check discharge chute wear, check separator bearings and seals, check storage hopper, check for leaks in air lines, cylinders and valves, check diaphragm valves for leaks.
  - (F) Spare parts shall be kept in stock to replace damaged parts.
  - (G) If failure of the emissions control equipment occurs, the shotblast machine shall be shut down immediately until the failed units are required or replaced.
- (3) Records shall be kept of the results of all inspections, notations, checks and actions performed under this plan. The Permittee has implemented this CAM Plan and is currently in compliance with this permit.
- (b) New Source Performance Standards (NSPS)
- There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (c) National Emission Standards for Hazardous Air Pollutants (NESHAPs),
- (1) The source is not subject to 40 CFR 63, Subpart Q - National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers because the source does not use a cooling tower that uses a chromium-based water treatment program.
  - (2) The open top degreasing operations at this source are not subject to the National Emission Standards for Halogenated Solvent Cleaning (326 IAC 20-6, 40 CFR 63, Subpart T) because the degreasing machine does not use a solvent containing methylene chloride, perchlorethylene, trichlorethylene, 1,1,1-trichlorethane, carbon tetrachloride, chloroform or any combination of these halogenated HAP solvents in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent.

**State Rule Applicability - Entire Source**

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted a Preventive Maintenance Plan (PMP) on April 19, 1999.

326 IAC 1-5-2 (Emergency Reduction Plans)

The source submitted an Emergency Reduction Plan (ERP) on April 19, 1999.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, therefore, fugitive emissions are not counted towards applicability of PSD.

The source was constructed in 1995. At the time of construction, the potential to emit of PM and PM10 before controls from the entire source was greater than 250 tons per year. The Construction Permit 045-4286-00013, issued on July 11, 1995, required that emissions of PM and PM10 from all facilities at the source be controlled pursuant to the requirements of 326 IAC 6-3 (Process Operations). The emissions control equipment included a wet scrubber for the Forging Press (FP-1) and baghouses for the Graphite Milling Machine (SCN106), the Shot Blast Machines (SC-1 and SC-2), the Electrical Discharge Machining (EDM-1) and the Hand Grinding Steel Forging Dies (GB1, GB2 and GB3). The potential to emit for any regulated pollutant from the entire source after the controls is less than 250 tons per year.

The Graphite Milling Machine was removed from the source prior to 2003. No other modifications have been made at this source that resulted in an increase in emissions of any regulated pollutant.

The draft permit includes the following limits on PM and PM10 emissions:

- (a) The emissions of PM and PM10 from the Forging Press (FP-1) shall be limited to less than 21.7 lbs per hour, which is equivalent to 95.0 tons per year. Operation of the wet scrubber assures compliance with this limit.
- (b) The emissions of PM and PM10 from the Shot Blast Machine (SC-1) shall be limited to less than 21.7 lbs per hour, which is equivalent to 95.0 tons per year. Operation of the baghouse assures compliance with this limit.
- (c) The emissions of PM and PM10 from the Electrical Discharge Machining (EDM-1) shall be limited to less than 2.13 lbs per hour, which is equivalent to 9.33 tons per year. Operation of the baghouse assures compliance with this limit.
- (d) The emissions of PM and PM10 from the Die Shop Shot Blast Machine (SC-2) shall be limited to less than 2.13 lbs per hour, which is equivalent to 9.33 tons per year. Operation of the baghouse assures compliance with this limit.
- (e) The emissions of PM and PM10 from the three (3) Hand Grinding Steel Forging Dies (GB1, GB2 and GB3) shall be limited to less than 2.13 lbs per hour, total, which is equivalent to 9.33 tons per year total for these three grinders. Operation of the baghouse assures compliance with this limit.

These limits are equivalent to 218 tons per year of PM and PM10. Compliance with these limits makes the source minor for PSD.

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

This source is not subject to the requirements of 326 IAC 2-4.1-1 because no new sources of HAP have been constructed or reconstructed at this source since July 27, 1997.

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 Exemptions), 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 6-4 (Fugitive Dust Emissions)**

Pursuant to 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 from paved and unpaved roads and parking lots with public access.

**State Rule Applicability - Individual Facilities**

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

(a) Forging Press (FP-1)

Pursuant to 326 IAC 6-3-2 (e)(3) (Particulate Emission Limitations), the allowable particulate emission rate from the forging press facility shall not exceed 21.7 lbs/hr pounds per hour when operating at a process weight rate of 24,000 pounds per hour.

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

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

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

The wet scrubber shall be in operation at all times that the forging press is in operation in order to comply with this limit.

(b) Shot Blast Machine (SC-1)

Pursuant to 326 IAC 6-3-2(e)(3) (Particulate Emission Limitations), the allowable particulate emission rate from the shot blast machine (SC-1) shall not exceed 21.7 lbs/hr pounds per hour when operating at a process weight rate of 24,000 pounds per hour.

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

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

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

The baghouse shall be in operation at all times that the shot blast machine is in operation in order to comply with this limit.

(c) Die Shop Shot Clean Machine (SC-2)

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations), the allowable PM emission rate from the die shop shot clean machine shall not exceed 11.2 lbs/hr pounds per hour when operating at a process weight rate of 9,000 pounds per hour.

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

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

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

The baghouse shall be in operation at all times that the die shop shot clean machine is in operation in order to comply with this limit.

- (d) Insignificant Activities: hand grinding steel forging dies (GB1, GB2 and GB3), electrical discharge machining (EDM-1), metal inert gas welding, and stick welding (DW-1).

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations), the allowable particulate emission rate from the metal inert gas welding and stick welding facilities (DW-1) shall not exceed 0.551 lbs/hr pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

Pursuant to 326 IAC 6-3-2(e)(3), (Particulate Emission Limitations) the allowable particulate emission rate from the hand grinding steel forging dies (GB1, GB2 and GB3) and the electrical discharge machining (EDM-1) shall not exceed 2.13 pounds per hour each when operating process rate of 750 pounds per hour.

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

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

The respective baghouse(s) shall be in operation at all times that the hand grinding steel forging dies and/or electrical discharge machining facilities are in operation in order to comply with this limit.

#### Operating Condition for Opacity

Pursuant to CP 045-4286-00013 issued on July 11, 1995 and operating permit T043-8515-00013 issued on January 19, 1999, particulate emissions from the affected facilities will be considered in compliance with 326 IAC 6-3-2 in the absence of particulate emissions compliance test provided that visible emissions do not exceed 10% opacity.

#### 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations)

The open top degreasing unit is subject to 326 IAC 8-3-3 because it was constructed after January 1, 1980.

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations constructed after January 1, 1980, the Permittee shall:

- (a) equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing workloads through the degreaser;

- (c) minimize solvent carry-out by:
  - (1) Racking parts to allow complete drainage;
  - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
  - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
  - (4) Tipping out any pools of solvent on the cleaned parts before removal;
  - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) not occupy more than half of the degreaser's open top area with the workload;
- (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) never spray above the vapor level;
- (h) repair solvent leaks immediately or shut down the degreaser;
- (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) not use workplace fans near the degreaser opening;
- (k) not allow visually detectable water in the solvent exiting the water separator; and
- (l) provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements)

The degreasing operation is subject to the provisions of 326 IAC 8-3-6 because it was constructed after July 1, 1990 and is an open top degreaser with an air to solvent interface of one (1) square meter (10.8 square feet) or greater.

Pursuant to 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements), for open top vapor degreasing operations with an air to solvent interface of ten and eight-tenths (10.8) square feet or greater and constructed after July 1, 1990,

- (a) The Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
  - (2) Equip the degreaser with the following switches:
    - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
    - (B) A spray safety switch shuts off spray pump if the vapor level drops more than four (4) inches.
  - (3) Equip the degreaser with a permanent, conspicuous label which lists the

operating requirements outlined in subsection (b).

- (4) Equip the degreaser with one (1) of the following control devices:
  - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powdered cover if the degreaser opening is greater than ten and eight-tenths (10.8) square feet; or
  - (B) A refrigerated chiller; or
  - (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser; or
  - (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifty (50) cubic feet per minute per square foot of air to vapor interface area and an average of less than twenty-five parts per million of solvent is exhausted over one (1) complete adsorption cycle; or
  - (E) Other systems of demonstrated equivalent or better control as those outlined in (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.
  
- (b) The Permittee shall ensure that the following operating requirements are met:
  - (1) Keep the cover closed at all times except when processing workloads through the degreaser;
  - (2) Minimize solvent carryout emissions by:
    - (A) racking articles to allow complete drainage;
    - (B) moving articles in and out of the degreaser at less than eleven (11) feet per minute;
    - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
    - (D) tipping out any pools of solvent on the cleaned article before removal; and
    - (E) allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
  - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood or rope;
  - (4) Prohibit occupation of more than one half ( $\frac{1}{2}$ ) of the degreaser's open top area with the workload;
  - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than four (4) inches when the workload is removed;
  - (6) Prohibit solvent spraying above the vapor level;
  - (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately;

- (8) Store waste solvent only in covered containers and prohibit the disposal transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent (by weight) could evaporate;
- (9) Prohibit the exhaust ventilation rate from exceeding sixty-five cubic feet per minute per square foot of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration (OSHA) requirements;
- (10) Prohibit the use of workplace fans near the degreaser opening;
- (11) Prohibit visually detectable water in the solvent exiting the water separator.

### Testing Requirements

The Shot Blast Machine (SC-1) at this source has a testing requirement. The other facilities at this source (Forging Press (FP-1), hand grinding steel forging dies (GB1, GB2 and GB3), electrical discharge machining (EDM-1) and die shop shotclean machine (SC-2)) do not have a testing requirement.

- (a) The Shot Blast Machine (SC-1) at this source accounts for a majority of the PTE for PM and PM10 emissions from this source before controls. During the period between 12 and 36 months after issuance of this Part 70 permit, in order to demonstrate compliance with emission limits imposed on this facility by 326 IAC 6-3-2 and 326 IAC 2-2, the Permittee shall perform PM and PM-10 testing for the Shot Blast Machine (SC-1), utilizing methods as approved by the Commissioner.
- (b) The forging press (FP-1), hand grinding steel forging dies (GB1, GB2 and GB3), electrical discharge machining (EDM-1) and die shop shotclean machine (SC-2) are each responsible for only a small portion of the total PTE for PM and PM10 emissions from the source before controls. These facilities are required to use scrubbers or baghouses to control PM and PM10 emissions. Opacity limits, visible emission notations, scrubber monitoring, quarterly baghouse inspection, and bag failure requirements have been added consistent with current compliance monitoring requirements for Title V sources. These monitoring requirements should be sufficient to ensure compliance with the particulate matter emission limitations specified in the Permit.

### 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.

The compliance monitoring requirements applicable to this source are as follows:

1. The forging press (FP-1) has applicable compliance monitoring conditions as specified below:
  - (a) Visible emissions notations of the forge press stack exhaust shall be performed once per shift during normal daylight operations. 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 monitor and record the pressure drop and flow rate of the wet scrubber, at least once per shift. The Preventive Maintenance Plan for the wet scrubber shall contain troubleshooting contingency and corrective actions for when pressure drop and flow rate readings are outside of the normal range for any one reading. The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. An inspection shall be performed each calendar quarter of the wet scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced. In the event that the wet scrubber's failure has been observed, the affected process will be shut down immediately until the failed unit has been replaced or repaired.

These monitoring conditions are necessary because the wet scrubber for the forging press must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes), 326 IAC 2-2 (PSD), and 326 IAC 2-7 (Part 70).

2. The shot blast machines (SC-1 and SC-2), electrical discharge machining (EDM-1) and hand grinding (GB-1) have applicable compliance monitoring conditions as specified below:
  - (a) Visible emissions notations of the stack exhaust for the shot blast machines (SC-1 and SC-2), electrical discharge machining (EDM-1) and hand grinding (GB-1) shall be performed once per shift during normal daylight operations when venting to the atmosphere. 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 total static pressure drop across the baghouse controlling the shot blast machines (SC-1 and SC-2), electrical discharge machining (EDM-1) and hand grinding (GB-1) at least once daily when the respective facilities are in operation when venting to the atmosphere. Unless

operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 2.0 to 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (c) An inspection shall be performed each calendar quarter of all bags controlling the shot blast machines (SC-1 and SC-2), electrical discharge machining (EDM-1) and hand grinding (GB-1) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional for those facilities whose baghouses vent to the indoors. All defective bags shall be replaced.
- (d) In the event that bag failure has been observed:
  - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.
  - (2) For single compartment baghouses, 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).

These monitoring conditions are necessary because the baghouses for the shot blast machines (SC-1 and SC-2), electrical discharge machining (EDM-1) and hand grinding (GB-1) must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Operations), 326 IAC 2-2 (PSD), and 326 IAC 2-7 (Part 70). These monitoring conditions are also necessary because the baghouse for shot blast machine (SC-1) must operate properly to ensure compliance with 40 CFR Part 64 (CAM).

## Conclusion

The operation of this stationary steel and iron forging operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T045-17584-00013.

**Appendix A: Emission Calculations  
PM and PM10 Emissions from the Forging Press**

**Company Name: ThyssenKrupp Gerlach Company  
Address: 1291 East 8th Street, Veedersburg, Indiana 47987  
Title V: T045-17584-00013  
Reviewer: ERG/ST  
Date: February 20, 2004**

**1. Data:**

- (a) 312.5 tons of graphite die lubricant are consumed on a yearly basis.\*
- (b) Graphite Die Lubricant is 14 % graphite by weight.\*
- (c) Scrubber control efficiency is 97%, as per manufacturer's specifications.
- (d) Process weight throughput of Forging Press is 24,000 lb/hr.

**2. Assumptions:**

- (a) Assume that all graphite becomes airborne particulate and is vented to the scrubber.
- (b) Assume all PM = PM10 (PM includes filterable and condensable PM).

**2. Potential to Emit of PM and PM10:**

312.5 tons/yr Graphite Lube x 14% (weight percent graphite) =	<b>43.8</b>	tons/yr before controls
43.8 tons/yr graphite emissions x (1 - 97% control efficiency) =	<b>1.31</b>	tons/yr after controls
1.31 tons/yr after controls * 2000 (lb/ton) / 8760 (hrs/yr) =	<b>0.30</b>	lbs/hr after controls

**3. Compliance with 326 IAC 6-3-2:**

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

Where: E = Rate of emission in pounds per hour; and  
P = Process weight in tons per hour.

$$E = 4.10 \times [(24,000/2,000)^{0.67}] = \quad \mathbf{21.7} \quad \text{lb/hr allowable emissions} = \quad \mathbf{94.9} \quad \text{tons/yr allowable emissions}$$

Allowable emissions from the Forging Press are 21.7 pounds per hour and calculated emissions from the Forging Press are 0.30 pounds per hour. The Forging Press is in compliance with 326

\* This data is from source records for the year 2002.

**Appendix A: Emission Calculations**  
**Natural Gas Combustion: MMBtu/hr < 100**  
**Combustion Emissions from the Space Heaters, Air Makeup Units and Water Heater**

**Company Name: ThyssenKrupp Gerlach Company**  
**Address: 1291 East 8th Street, Veedersburg, Indiana 47987**  
**Title V: T045-17584-00013**  
**Reviewer: ERG/ST**  
**Date: February 20, 2004**

Description	Emission Unit ID	Heat Input Capacity (MMBtu/hr)	Max. Potential Throughput (MMCF/yr)
Two (2) Space Heaters	FE17, FE18	0.64	5.61
Two (2) Makeup Air Units	MAU-1, MAU-2	14.4	126
Two (2) AC/Heaters	AC-1, AC-3	0.27	2.37
Three (3) AC/Heaters	AC-2, AC-4, AC-5	0.36	3.15
One (1) Air Rotation Unit	ARU-1	3.13	27.4
One (1) Water Heater	WH-1	0.25	2.20

Pollutant Emission Factors (lbs/MMCF)						
PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub> **	CO	VOC	HAPs
7.60	7.60	0.60	100	84.0	5.50	0.09

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HAPs
FE17, FE18	0.02	0.02	0.002	0.28	0.24	0.02	0.0002
MAU-1, MAU-2	0.48	0.48	0.038	6.31	5.30	0.35	0.0055
AC-1, AC-3	0.01	0.01	0.001	0.12	0.10	0.01	0.0001
AC-2, AC-4, AC-5	0.01	0.01	0.001	0.16	0.13	0.01	0.0001
ARU-1	0.10	0.10	0.008	1.37	1.15	0.08	0.0012
WH-1	0.01	0.01	0.001	0.11	0.09	0.01	0.0001
<b>Totals</b>	<b>0.63</b>	<b>0.63</b>	<b>0.050</b>	<b>8.34</b>	<b>7.01</b>	<b>0.46</b>	<b>0.0073</b>

\*PM and PM10 emission factor are for condensable and filterable PM and PM10 combined.

\*\*Emission factors for NO<sub>x</sub>: Uncontrolled = 100 lb/MMCF.

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (7/98)

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

1000 Btu per cubic foot of natural gas

#### Methodology

Max. Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x (1 MMCF/1,000,000 cubic feet gas) x (1 cubic feet gas/ 1,000 Btu) x 1,000,000 Btu/MMBtu.

PTE for PM, PM10, NO<sub>x</sub>, SO<sub>2</sub>, CO, VOC and HAPs (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Total HAP emissions from the space heaters and water heater are negligible.

**Appendix A: Emission Calculations**  
**PM and PM10 Emissions from Two (2) Shot Blast Machines, Identified as SC-1 and SC-2**

**Company Name: ThyssenKrupp Gerlach Company**  
**Address: 1291 East 8th Street, Veedersburg, Indiana 47987**  
**Title V: T045-17584-00013**  
**Reviewer: ERG/ST**  
**Date: February 20, 2004**

**1. Emissions Calculations:**

Potential To Emit of PM and PM10 from Shot Blast Machine SC-1								
Emission Factor (grains/ft <sup>3</sup> at 5430 acfm)	Source of Emission Factor	1995 stack test	PTE Before Controls (tons/yr)		PTE After Controls (tons/yr)		PTE After Controls (lbs/hr)	
			PM	PM10	PM	PM10	PM	PM10
4.00	Before Control	1995 stack test	815	815	0.88	0.88	0.20	0.20
0.0043	After Control	1995 stack test						

Shotblast Machine SC-1 operates at a maximum process weight of 24,000 lbs/hr.

**Methodology**

PTE of PM/PM10 Before Control (tons/yr) = Emission Factor Before Control (gr/ft<sup>3</sup>) x 5430 (ft<sup>3</sup>/min) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1/2000

PTE of PM/PM10 After Control (tons/yr) = Emission Factor After Control (gr/ft<sup>3</sup>) x 5430 (ft<sup>3</sup>/min) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1/2000 (tons/lb)

PTE of PM/PM10 After Control (lbs/hr) = Emission Factor After Control (gr/ft<sup>3</sup>) x 5430 (ft<sup>3</sup>/min) x 60 (min/hr) x 1/7000 (lb/gr)

Potential To Emit of PM and PM10 from Shot Blast Machine SC-2										
Process Rate (lbs/hr)	Pollutant	* Emission Factor (lb/ton)	Control Efficiency (%)	Capture Efficiency (%)	PTE Before Controls (tons/yr)		PTE After Controls (tons/yr)		PTE After Controls (lbs/hr)	
					PM	PM10	PM	PM10	PM	PM10
9000	PM	17.0	99%	99%	335.1		6.67		1.52	
9000	PM10	1.70				33.51		0.667		0.152

\* Emission factors for the shotblast machine (SC-2) (Method #1) are from FIRE, Vol. II - Gray Iron Foundries - Grinding/Cleaning (SCC 3-04-003-40).

**Methodology**

PTE for PM/PM10 Before Control (Method #1)(tons/yr) = Process Rate (lbs/hr) x 1/2000 (ton/lbs) x Emission Factor (lbPM/ton) x 8760 (hr/yr) x 1/2000 (ton/lb)

PTE for PM/PM10 After Control (Method #1)(tons/yr) = PTE Before Controls (tons/yr) x (1-(control efficiency x capture efficiency))

**2. Compliance with 326 IAC 6-3-2:**

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

Where: E = Rate of emission in pounds per hour; and  
P = Process weight in tons per hour. 240

Shotblast Machine SC-1  $E = 4.10 \times [(24,000/2,000)^{0.67}] = 21.7$  lb/hr allowable emissions = **94.9** ton/yr allowable emissions

Shotblast Machine SC-2  $E = 4.10 \times [(9,000/2,000)^{0.67}] = 11.2$  lb/hr allowable emissions = **49.2** ton/yr allowable emissions

Allowable emissions from the Shotblast Machine SC-1 are 21.7 pounds per hour and calculated emissions from the Shotblast Machine SC-1 are 0.20 pounds per hour. The Shotblast Machine SC-1 is in compliance with 326 IAC 6-3-2.

Allowable emissions from the Shotblast Machine SC-2 are 11.2 pounds per hour and calculated emissions from the Shotblast Machine SC-2 are 0.13 pounds per hour. The Shotblast Machine SC-2 is in compliance with 326 IAC 6-3-2.