



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 1, 2004

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

TO: Interested Parties / Applicant
RE: PK USA / 145-17860-00019
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 9/16/03



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**PK USA, Inc.
600 Northridge Drive
Shelbyville, Indiana 46176**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, (326 IAC 2-5.1 if new source), 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 145-17860-00019	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 2, 2004 Expiration Date: July 2, 2009

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
B	GENERAL CONDITIONS	5
B.1	Permit No Defense [IC 13]	
B.2	Definitions	
B.3	Effective Date of the Permit [IC 13-15-5-3]	
B.4	Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]	
B.5	Modification to Permit [326 IAC 2]	
B.6	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.7	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.8	Permit Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.9	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.10	Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]	
B.11	Annual Fee Payment [326 IAC 2-1.1-7]	
C	SOURCE OPERATION CONDITIONS	9
C.1	Particulate Emission Limitation For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]	
C.6	Performance Testing [326 IAC 3-6]	
C.7	Compliance Requirements [326 IAC 2-1.1-11]	
C.8	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
	Record Keeping and Reporting Requirements	
C.9	Malfunctions Report [326 IAC 1-6-2]	
C.10	General Record Keeping Requirements [326 IAC 2-6.1-2]	
C.11	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	
D.1	EMISSIONS UNIT OPERATION CONDITIONS	13
	Emission Limitations and Standards	
D.1.1	Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]	
D.1.2	Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]	
	Compliance Determination Requirements	
D.1.3	Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]	
	Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]	
D.1.4	Record Keeping Requirements	
D.2	EMISSIONS UNIT OPERATION CONDITIONS	15
	Emission Limitations and Standards	
D.2.1	Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]	
D.2.2	Record Keeping Requirements	

D.3 EMISSIONS UNIT OPERATION CONDITIONS..... 16

Annual Notification 19

Malfunction Report 20

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary automotive parts manufacturing plant.

Authorized Individual:	Manager
Source Address:	600 Northridge Drive, Shelbyville, Indiana 46176 (Plant 1) 1755 McCall Drive, Shelbyville, Indiana 46176 (Plant 2)
Mailing Address:	600 Northridge Drive, Shelbyville, Indiana 46176
General Source Phone:	1-317-698-6909
SIC Code:	3465
County Location:	Shelby
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) electro-deposition line, coating small auto metal parts with a maximum coating throughput rate of 5.54 gallons per hour and exhausting at stacks EC-1 through EC-4. This unit was constructed in 1998.
- (b) One (1) flaw-repair line and one (1) maintenance line, each with a maximum throughput rate of 0.18 gallons per hour. The flaw-repair line exhausts inside the building. These units were installed in 1998.
- (c) One (1) natural gas-fired electrocoating heater, with a maximum heat input capacity of 5.00 MMBtu per hour. This unit was constructed in 1998.
- (d) Two (2) fire pumps burning No.2 fuel oil, with a combined maximum heat input capacity of 2.32 MMBtu per hour and a sulfur content of 0.3 percent. These units were constructed in 1998.
- (e) Four (4) natural gas-fired air make-up units, with a combined maximum heat input capacity of 23.5 MMBtu per hour. These units were installed in 1990.
- (f) Twenty-five (25) MIG welding stations, each with a maximum consumption rate of 2.50 pounds of electrode consumption per hour. These units were constructed in 1988.
- (g) One (1) injection molding process, consisting of eight (8) machines in parallel using plastic pellets at a maximum throughput rate of 664 pounds per hour. These units were constructed in 1988. Each machine is capable of making separate parts through the injection molding process.

- (h) Press machinery equipment for steel stamping, consisting of seven (7) presses. These units were installed in 1988.
- (i) Twenty-six (26) natural gas-fired space heaters, with a combined maximum heat input capacity of 37.9 MMBtu per hour. These units were installed in 1988.

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

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

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

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

B.5 Modification to Permit [326 IAC 2]

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

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

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

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

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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).

C.5 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 an "authorized individual" as defined by 326 IAC 2-7-1(34).
- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements

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

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) electro-deposition line, coating small auto metal parts with a maximum coating throughput rate of 5.54 gallons per hour and exhausting at stacks EC-1 through EC-4. This unit was constructed in 1998.

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

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water, as delivered to the applicator.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents, if sprayed from the application equipment of electro-deposition coating line during cleanup or color changes, shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage; and
 - (4) The total VOC usage for each month.

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

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Description:

- (b) One (1) flaw-repair line and one (1) maintenance line, each with a maximum throughput rate of 0.18 gallons per hour. The flaw-repair line exhausts inside the building. These units were installed in 1998.

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

Emission Limitations and Standards

D.2.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

The actual VOC emissions from the one (1) flaw repair line are less than fifteen (15) pounds per day. Any changes or modifications that would increase the actual VOC emissions to greater than fifteen (15) pounds per day must receive prior approval from IDEM, OAQ.

D.2.2 Record Keeping Requirements

- (a) To document compliance with condition D.2.1, the Permittee shall maintain daily records in accordance with (1) and (3) below to establish compliance with the VOC usage limit established in condition D.2.1.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used each day. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used and solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents if any used.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Description:

- (c) One (1) natural gas-fired electrocoating heater, with a maximum heat input capacity of 5.00 MMBtu per hour. This unit was constructed in 1998.
- (d) Two (2) fire pumps burning No.2 fuel oil, with a combined maximum heat input capacity of 2.32 MMBtu per hour and a sulfur content of 0.3 percent. These units were constructed in 1998.
- (e) Four (4) natural gas-fired air make-up units, with a combined maximum heat input capacity of 23.5 MMBtu per hour. These units were installed in 1990.
- (f) Twenty-five (25) MIG welding stations, each with a maximum consumption rate of 2.50 pounds of electrode consumption per hour. These units were constructed in 1988.
- (g) One (1) injection molding process, consisting of eight (8) machines in parallel using plastic pellets at a maximum throughput rate of 664 pounds per hour. These units were constructed in 1988. Each machine is capable of making separate parts through the injection molding process.
- (h) Press machinery equipment for steel stamping, consisting of eleven (11) presses. These units were installed in 1988.
- (i) Twenty-six (26) natural gas-fired space heaters, with a combined maximum heat input capacity of 37.9 MMBtu per hour. These units were installed in 1988.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name: PK USA, Inc.
Address: 600 Northridge Drive
City: Shelbyville, Indiana 46176
Phone #: (317) 538-7797
MSOP #: 145-17860-00019

I hereby certify that PK USA, Inc. is still in operation.
 no longer in operation.

I hereby certify that PK USA, Inc. is in compliance with the requirements of MSOP 145-17860-00019
 not in compliance with the requirements of MSOP 145-17860-00019

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: PK USA, Inc.
Source Location: 600 Northridge Drive, Shelbyville, Indiana 46176 (Plant 1)
1755 McCall Drive, Shelbyville, Indiana 46176 (Plant 2)
County: Shelby
SIC Code: 3465
Operation Permit No.: 145-17860-00019
Permit Reviewer: ERG/SD

On May 13, 2004 the Indiana Department of Environmental Management (IDEM) and Office of Air Quality (OAQ) had a notice published in the Shelbyville News, Shelbyville, Indiana, stating that PK USA, Inc. had applied for a Minor Source Operating Permit (MSOP) to operate a stationary automotive parts manufacturing plant. The notice also stated that IDEM, OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 18, 2004, PK USA, Inc. submitted comments on the proposed MSOP. The summary of the comments and responses are shown below. Deleted text will be shown as ~~strikeout~~ and new text will be shown as **bold**.

Comment 1:

The source requested the following revisions to the facility description under Section A.1:

1. Specify the source location of plant 2 as 1755 McCall Drive, Shelbyville, Indiana 46176 and that of plant 1 as 600 Northridge Drive, Shelbyville, Indiana 46176.
2. Correct the mailing address from "600 Northridge, Shelbyville" to "600 Northridge Drive, Shelbyville..".
3. Correct the general source phone number from 1-317-538-7797 to (317) 698-6909
4. Correct the SIC code from 3714 (Motor vehicles parts and accessories) to 3465 (Automotive stamping) which better reflects the operations at the source.

The source requested the following revisions to the facility description under Section A.2.

5. Item (b): Identify that the flaw repair line and the maintenance line are two independent processes each with a maximum throughput rate of 0.18 gallons per hour.
6. Item (g): Clarify that the injection molding process consists of eight (8) machines using plastic pellets and operating in parallel. Each machine is capable of making separate parts through the injection molding process.

Response to Comment 1:

The facility descriptions under Section A.1 and A.2 have been corrected. For clarification purposes, Section D.2 and D.3 have also been corrected so that it agrees with the changes to Section A.2 as shown below.

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

The Permittee owns and operates a stationary automotive parts manufacturing plant.

Authorized Individual:	Manager
Source Address:	600 Northridge Drive, Shelbyville, Indiana 46176 (Plant 1) 1755 McCall Drive, Shelbyville, Indiana 46176 (Plant 2)
Mailing Address:	600 Northridge Drive, Shelbyville, Indiana 46176
General Source Phone:	1-317-698-6909 1-317-538-7797
SIC Code:	3465 3714
County Location:	Shelby
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

....

- (b) One (1) flaw-repair line and one (1) maintenance line, each with a maximum throughput rate of ~~0.180-36~~ gallons per hour. **The flaw-repair line exhausts inside the building. These units were installed in 1998.**

....

- (g) One (1) injection molding process, consisting of eight (8) machines in parallel using plastic pellets at a maximum throughput rate of 664 pounds per hour. ~~This unit was~~ **These units were constructed in 1988. Each machine is capable of making separate parts through the injection molding process.**

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Description:

- (b) One (1) flaw-repair line and one (1) maintenance line, each with a maximum throughput rate of ~~0.180-36~~ gallons per hour. **The flaw-repair line exhausts inside the building. These units were installed in 1998.**

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

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Description:

....

- (g) One (1) injection molding process, consisting of eight (8) machines **in parallel** using plastic pellets at a maximum throughput rate of 664 pounds per hour. ~~This unit was~~ **These units were** constructed in 1988. **Each machine is capable of making separate parts through the injection molding process.**

....

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

Comment 2:

The source requested the following changes to the TSD and Appendix A:

1. Remove the word "formerly" from the Source Definition section Item (b) in the TSD;
2. Revise items (b) and (g) as described in Comment 1 above and as listed under Permitted Emission Units and Pollution Control Equipment in the TSD;
3. Indicate that item (b) exhausts inside the building;
4. Clarify that there are approximately twenty-five (25) MIG welders at the source; and
5. Clarify that 2-butoxy ethanol is classified as a glycol ether but not specifically listed as HAP.

Response to Comment 2:

No changes have been made to the TSD and Appendix A because IDEM, OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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

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

Source Background and Description

Source Name:	PK USA, Inc.
Source Location:	600 Northridge Drive, Shelbyville, Indiana 46176
County:	Shelby
SIC Code:	3465
Operation Permit No.:	145-17860-00019
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from PK USA, Inc. relating to the operation of automotive parts manufacturing plant.

Source Definition

PK USA, Inc. consists of two (2) plants:

- (a) Plant 1 is located at 600 Northridge Drive, Shelbyville, Indiana 46176; and
- (b) Plant 2, formerly named Blue River Stamping, Inc., is located at 1755 McCall Drive, Shelbyville, Indiana 46176.

The distance between plant 1 and plant 2 is approximately 1.0 miles. The two (2) plants have the same SIC codes (3465) and are owned by one (1) company (Press Kogyo, Japan). Plant 1 receives approximately fifty percent (50%) of the product from plant 2 for processing. IDEM, OAQ, has determined that since the two (2) plants are adjacent, have the same SIC codes, are owned by one (1) company, and there is a direct support facility relationship between the two (2) plants, they will be considered as one source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) electro-deposition line, coating small auto metal parts with a maximum coating throughput rate of 5.54 gallons per hour and exhausting at stacks EC-1 through EC-4. This unit was constructed in 1998.
- (b) One (1) flaw-repair and maintenance line, with a maximum throughput rate of 0.36 gallons per hour. This unit was installed in 1998.
- (c) One (1) natural gas-fired electrocoating heater, with a combined maximum heat input capacity of 5.00 MMBtu per hour. This unit was constructed in 1998.
- (d) Two (2) fire pumps burning No.2 fuel oil, with a combined maximum heat input capacity of 2.32 MMBtu per hour and a sulfur content of 0.3 percent. These units were constructed in 1998.

- (e) Four (4) natural gas-fired air make-up units, with a combined maximum heat input capacity of 23.5 MMBtu per hour. These units were installed in 1990. Note: The maximum heat input capacity of the four (4) air make-up units were incorrectly identified in the registration issued on May 18, 1990.
- (f) Twenty-five (25) MIG welding stations, each with a maximum consumption rate of 2.50 pounds of electrode consumption per hour. These units were constructed in 1988.
- (g) One (1) injection molding process, consisting of eight (8) machines using plastic pellets at a maximum throughput rate of 664 pounds per hour. This unit was constructed in 1988.
- (h) Press machinery equipment for steel stamping, consisting of seven (7) presses. These units were installed in 1988.
- (i) Twenty-six (26) natural gas-fired space heaters, with a combined maximum heat input capacity of 37.9 MMBtu per hour. These units were installed in 1988.

Exempt Emission Units and Pollution Control Equipment

The source also consists of the following exempt emission units, not previously identified by the Permittee:

- (j) Nineteen (19) natural gas-fired combustion units, with a combined maximum heat input capacity of 5.45 MMBtu per hour. These units were installed in 1990.

Existing Approvals

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

- (a) Registration (no number assigned) issued October 7, 1988.
- (b) Registration (no number assigned) issued March 13, 1990.
- (c) Registration no. 3840-00019 issued May 18, 1990.
- (d) Registration no. 145-00019 issued April 8, 1991.
- (e) Registration no. 145-9197-00019 issued March 24, 1998.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) Registration no. 3840-00019 issued May 18, 1990.
Condition: Any change or modification, which may increase the potential emissions to 25 tons of any regulated pollutant per year or more from equipment covered in this letter must be approved by the Office of Air Management before such change may occur.

Reason not incorporated: Since the potential to emit of NO_x and CO is greater than twenty-five (25) tons per year, a MSOP was drafted. Therefore, this condition no longer applies.

Enforcement Issue

- (a) IDEM is aware that the source did not apply for a MSOP in a timely manner. IDEM is reviewing this matter and will take appropriate action.

- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

Recommendation

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

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

An application for the purposes of this review was received on August 18, 2003, with additional information received on February 6, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 16).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/year)
PM	9.52
PM10	9.52
SO ₂	3.17
VOC	13.7
CO	26.8
NO _x	32.9

HAPs	Potential to Emit (tons/year)
Glycol Ether	3.21
2-Butoxy Ethanol	0.25
Total	3.46

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of pollutants are less than 100 tons per year. The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of NO_x and CO are greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (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 and Emission Offset applicability.

County Attainment Status

The source is located in Shelby County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO ₂	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. Shelby County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Shelby County has been classified as attainment for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	9.52
PM10	9.52
SO ₂	3.17
VOC	13.7
CO	26.8
NO _x	32.9
Single HAP (Glycol Ether)	3.21
Combination HAPs	3.46

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on potential to emit calculations for the source as shown in Appendix A.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,

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

This status is based on the potential to emit calculations for the source as shown in Appendix A.

Federal Rule Applicability

- (a) This source is not subject to the New Source Performance Standard (NSPS), 326 IAC 12 (40 CFR 60.720, Subpart TTT - Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines), because the source does not coat plastic parts. The source only coats small automotive metal parts.

There are no other New Source Performance Standards (NSPS), 326 IAC 12, (40 CFR 60) applicable to this source.

- (b) This source is not subject to 40 CFR 63, Subpart MMMM - National Emission Standard for Hazardous Air Pollutant (NESHAPs) for Miscellaneous Metal Parts and Products because this source is not a major source of Hazardous Air Pollutants (HAPs).
- (c) This source is not subject to 40 CFR 63, Subpart N - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chromium Electroplating because the source does not do any chromium electroplating or have any chrome tanks.

There are no National Emission Standard for Hazardous Air Pollutant (NESHAPs) (326 IAC 14 and 40 CFR 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

PK USA, Inc. was constructed in 1988 and is not in one (1) of the twenty-eight (28) categories. At the time the source was constructed, it was a minor source under PSD because the potential to emit of each criteria pollutant before controls was less than the PSD major source threshold of 250 tons per year. After each modification since its construction, the potential to emit of each criteria pollutant was calculated to be below 250 tons per year PSD threshold. Therefore, this source is not subject to the requirements of 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

This source is located in Shelby County and the potential to emit of CO, NO_x, VOC, PM₁₀, and SO₂ is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

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

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this small automotive parts manufacturing plant will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Electro-deposition coating Line, Flaw Repair Line, Maintenance & Cleaning Line

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

- (a) Although constructed after January 1, 1980, the electro-deposition coating line is not subject to the provisions of 326 IAC 8-1-6 because this facility is currently subject to 326 IAC 8-2-9. Facilities that are subject to other Article 8 rules are exempt from the requirements of 326 IAC 8-1-6.
- (b) Although constructed after January 1, 1980, the flaw repair line would become subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating) when the actual VOC emissions are greater than or equal to fifteen (15) pounds per day. Therefore, it is not subject to the requirements of 326 IAC 8-1-6.
- (c) The maintenance & cleaning line is not subject to the provisions of 326 IAC 8-1-6 because this facility does not have the potential VOC emissions of greater than twenty-five (25) tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) The electro-deposition coating line is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the actual emissions of VOC are greater than fifteen (15) pounds per day and the source's Standard Industrial Classification Code is one of the listed codes in this rule.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating at electro-deposition coating line, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings when coating metal parts.

Solvent, if sprayed from application equipment during cleanup or color changes, shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the electro-deposition coating line is in compliance with this requirement.

- (b) The flaw repair line is not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the actual emissions of VOC are less than fifteen (15) pounds per day. Any change or modification which would increase the actual emissions of VOC greater than fifteen (15) pounds per day must receive prior approval from IDEM, OAQ.

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

- (a) Although the electro-deposition coating line uses more than five (5) gallons of coating per day, it is not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because this facility applies coating by dipping process, which results in negligible particulate emissions (326 IAC 6-3-1).
- (b) The flaw repair line and maintenance & cleaning line are not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because these facilities use less than five (5) gallons of coating/cleaning solvents per day.

State Rule Applicability – Injection Molding

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

Although constructed after January 1, 1980, the injection molding process is not subject to the provisions of 326 IAC 8-1-6 because this facility does not have the potential VOC emissions of greater than twenty-five (25) tons per year.

State Rule Applicability - Welding Stations

326 IAC 6-3 (Particulate Matter Emission Limitations from Manufacturing Processes)

This source is not subject to 326 IAC 6-3-1 (Particulate Matter Emission Limitations from Manufacturing Processes) because the welding stations consumes less than six hundred and twenty-five (625) pounds of rod or wire per day [326 IAC 6-3-1(b)(9)].

State Rule Applicability – Two (2) Fire Pumps Burning No.2 Fuel Oil

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The two (2) fire pumps burning No. 2 fuel oil are not subject to this rule because they do not have the potential to emit of SO₂ greater than twenty-five (25) tons per year.

State Rule Applicability – Natural Gas-Fired Combustion Units (such as Space Heaters, Air Make-up Units)

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

The natural gas-fired combustion units are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because these combustion units are used for heating purposes only.

Conclusion

The operation of this automotive parts manufacturing plant shall be subject to the conditions of the Minor Source Operating Permit 145-17860-00019.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Space Heaters, and RT-1, and RT-2**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMCF/year)

37.9 (26 units total)

332

	Pollutant					
	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	1.26	1.26	0.10	16.6	0.91	14.0

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

**Emission factors for NO_x (Uncontrolled) = 100 lb/MMCF

Emission factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential throughput (MMCF/year) = Heat input capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

PTE (tons/year) = Potential throughput (MMCF/year) * Emission factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Space Heaters, and RT-1, and RT-2**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	3.49E-04	1.99E-04	1.25E-02	2.99E-01	5.65E-04

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	8.310E-05	1.828E-04	2.327E-04	6.316E-05	3.490E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Air Make-up Units**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMCF/year)

23.5 (4 units total)

205

	Pollutant					
	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.78	0.78	0.06	10.3	0.56	8.63

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

**Emission factors for NO_x (Uncontrolled) = 100 lb/MMCF

Emission factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential throughput (MMCF/year) = Heat input capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

PTE (tons/year) = Potential throughput (MMCF/year) * Emission factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Air Make-up Units

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	2.16E-04	1.23E-04	7.70E-03	1.85E-01	3.49E-04

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	5.136E-05	1.130E-04	1.438E-04	3.903E-05	2.157E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Gas Heaters, Unit Heaters**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMCF/year)

5.45 (19 units total)

47.7

	Pollutant					
	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.18	0.18	0.01	2.39	0.13	2.01

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

**Emission factors for NO_x (Uncontrolled) = 100 lb/MMCF

Emission factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential throughput (MMCF/year) = Heat input capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

PTE (tons/year) = Potential throughput (MMCF/year) * Emission factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Gas Heaters, Unit Heaters

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	5.01E-05	2.86E-05	1.79E-03	4.30E-02	8.12E-05

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	1.194E-05	2.626E-05	3.342E-05	9.071E-06	5.013E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
One (1) Electrodeposition line Heater**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMCF/year)

5.00 (1 unit only)

43.8

	Pollutant					
	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.17	0.17	0.01	2.19	0.12	1.84

* PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

** Emission factors for NO_x (Uncontrolled) = 100 lb/MMCF

Emission factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential throughput (MMCF/year) = Heat input capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

PTE (tons/year) = Potential throughput (MMCF/year) * Emission factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
One (1) Electrodeposition line Heater**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Pit ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	4.60E-05	2.63E-05	1.64E-03	3.94E-02	7.45E-05

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
No. 2 Fuel Oil Combustion
Two (2) Fire Pumps**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(kgals/year)

S = Weight % Sulfur
0.30

2.32 (2 Units Total)

140

Emission Factor (lb/kgal)	Pollutant				
	PM/PM10*	SO2	NOx	VOC	CO
	2.00	42.6 (142.0 S)	20.0	0.34	5.00
Potential To Emit (tons/year)	0.14	2.98	1.40	0.02	0.35

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal. Assume all PM emissions are equal to PM10.

Note: Emission factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98.

1 gallon of No. 2 Fuel Oil has a heating value of 144,905 Btu per gallon.

METHODOLOGY

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 kgal/1000 gal * 1 gal/0.144905 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/kgal) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
No. 2 Fuel Oil Combustion
Two (2) Fire Pumps**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

HAPs - Metals

Emission Factor (lb/MMBtu)	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential To Emit (tons/year)	4.06E-05	3.04E-05	3.04E-05	3.04E-05	9.13E-05

HAPs - Metals (continued)

Emission Factor (lb/MMBtu)	Mercury 3.0E-06	Mangamese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential To Emit (tons/year)	3.04E-05	6.09E-05	3.04E-05	1.52E-04

No data was available in AP-42 for organic HAPs.

METHODOLOGY

Potential To Emit (tons/year) = Heat Input Capacity (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760 hours/year * 1 ton/2000lb

**Appendix A: Emission Calculations
No. 2 Fuel Oil Combustion
Two (2) Fire Pumps**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(kgals/year)

S = Weight % Sulfur
0.30

2.32 (2 Units Total)

140

Emission Factor (lb/kgal)	Pollutant				
	PM/PM10*	SO2	NOx	VOC	CO
	2.00	42.6 (142.0 S)	20.0	0.34	5.00
Potential To Emit (tons/year)	0.14	2.98	1.40	0.02	0.35

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal. Assume all PM emissions are equal to PM10.

Note: Emission factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98.

1 gallon of No. 2 Fuel Oil has a heating value of 144,905 Btu per gallon.

METHODOLOGY

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 kgal/1000 gal * 1 gal/0.144905 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/kgal) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
No. 2 Fuel Oil Combustion
Two (2) Fire Pumps**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

HAPs - Metals

Emission Factor (lb/MMBtu)	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential To Emit (tons/year)	4.06E-05	3.04E-05	3.04E-05	3.04E-05	9.13E-05

HAPs - Metals (continued)

Emission Factor (lb/MMBtu)	Mercury 3.0E-06	Mangamese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential To Emit (tons/year)	3.04E-05	6.09E-05	3.04E-05	1.52E-04

No data was available in AP-42 for organic HAPs.

METHODOLOGY

Potential To Emit (tons/year) = Heat Input Capacity (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760 hours/year * 1 ton/2000lb

**Appendix A: Emissions Calculations
VOC and PM/PM10 Emissions
From One (1) Electrodeposition Line**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

Emission Unit	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	*PTE of PM/PM10 (tons/year)	**Transfer Efficiency
Electrodeposition	9.23	65.7%	63.7%	2.06%	70.5%	27.0%	0.000924	6000	0.65	0.19	1.05	25.3	4.62	0.0	100%
													4.62	0.00	

* Assume all PM emissions are equal to PM10
** Coating is applied to automotive parts by dipping process.
There are no HAP emissions associated with the material used in the electro-deposition process.

PTE of VOC (tons per year) = 4.62
PTE of VOC (lbs/hour) = 1.05
Actual VOC Emissions (lbs/day) = 21.1

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) * Weight % Organics * 1/(1-Volume % water)
Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics
PTE of VOC (lbs/hour) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour)
PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 24 hour/day
PTE of VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 8760 hour/year * 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) = Maximum (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency %) * 8760 hours/year * 1 ton/2000 lbs
Actual VOC Emissions (lbs/day) = PTE of VOC (lbs/hour) * Actual Hours of Operation (6240 hours/year) * 1year/312 Days of Operation

**Appendix A: Emissions Calculations
VOC and HAP Emissions
From One (1) Maintenance Line**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

POTENTIAL TO EMIT OF HAPS

Emission Unit	Density (lb/gal)	Max. Usage Rate (gal/hour)	Weight %	PTE of VOC/Glycol Ethers (ton/year)
Maintenance/Cleaning	7.51	0.18	50%	2.96

2.96

METHODOLOGY

Potential To Emit (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % VOC/HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC and PM/PM10 Emissions
From One (1) Flaw Repair Line**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

Emission Unit	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	*PTE of PM/PM10 (tons/year)	**Transfer Efficiency
Flaw Repair	6.43	86.0%	0.0%	86.0%	0.0%	9.6%	0.000030	6000	5.53	5.53	1.00	23.9	4.36	0.39	45%
							0.18						4.36	0.39	

* Assume all PM emissions are equal to PM10
** Coating applied using Pressurized Aerosol Cans

PTE of VOC (tons per year) = 4.36
PTE of VOC (lbs/hour) = 1.00
Actual VOC Emissions (lbs/day) = 3.98

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) * Weight % Organics * 1/(1-Volume % water)
Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics
PTE of VOC (lbs/hour) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour)
PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 24 hour/day
PTE of VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 8760 hour/year * 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) = Maximum (units/hour) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency %) * 8760 hours/year * 1 ton/2000 lbs
Actual VOC Emissions (lbs/day) = PTE of VOC (lbs/hour) * Actual Hours of Operation (1248 hours/year) * 1year/312 Days of Operation

**Appendix A: Emissions Calculations
HAP Emissions
From One (1) Electrodeposition Line**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

POTENTIAL TO EMIT OF HAPS

Emission Unit	Density (lb/gal)	Max. Usage Rate (gal/hour)	Weight % Glycol Ether	Weight % 2-Butoxy Ethanol	PTE of Glycol Ether (ton/year)	PTE of 2-Butoxy Ethanol (ton/year)
Flaw Repair	6.43	0.18	5.0%	5.0%	0.25	0.25
					0.25	0.25

METHODOLOGY

Potential To Emit HAPs (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Emissions
From Welding Operation**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Plt ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

Emission Unit	Number of Stations	Max. electrode consumption per station (lbs/hour)	* Emission Factor (lb pollutant / lb electrode)				Potential To Emit				
			PM/PM10	Mn	Ni	Cr	PM/PM10	Mn	Ni	Cr	HAPs
WELDING											
Metal Inert Gas (MIG)(steel)	25	2.50	0.0241	0.000034		0.00001	1.51	2.1E-03	0E+00	6.25E-04	2.8E-03

PTE (lbs/hour) =	1.51	2.13E-03	0.0E+00	6.3E-04	2.8E-03
PTE (lbs/day) =	36.2	5.10E-02	0.0E+00	1.5E-02	6.6E-02
PTE (tons/year) =	6.60	9.31E-03	0.0E+00	2.7E-03	1.2E-02

Welding and other flame cutting emission factors are from an internal training session document.
 Emission factors are from AP-42, Chapter 12.19 - January, 1995.

METHODOLOGY

PTE (lb/hour) = No. of stations * Max. lbs of electrode used/hour/station * Emission Factor (lb pollutant / lb of electrode used)
 PTE (lbs/day) = No. of stations * Max. lbs of electrode used/hour/station * Emission Factor (lb pollutant / lb of electrode used) * 24 hours/day
 PTE (tons/year) = No. of stations * Max. lbs of electrode used/hour/station * Emission Factor (lb pollutant / lb of electrode used) * 8760 hours/year * 1ton/2000 lbs

**Appendix A: Emission Calculations
Summary of Emissions**

Company Name: PK USA, Inc.
Address: 600 Northridge Drive, Shelbyville, Indiana 46176
MSOP: 145-17860
Pit ID: 145-00019
Reviewer: ERG/SD
Date: February 11, 2003

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	SO₂	NOx	VOC	CO	Gylcol Ether	Combined HAPs
Space Heaters	1.26	1.26	0.10	16.6	0.91	14.0		
Air Make-up Units	0.78	0.78	0.06	10.3	0.56	8.63		
Gas Heaters	0.18	0.18	0.01	2.39	0.13	2.01		
Electrodeposition line Heater	0.17	0.17	0.01	2.19	0.12	1.84		
Two Fire Pumps	0.14	0.14	2.98	1.40	0.02	0.35		
Electrodeposition Line					4.62			
Maintenance Line					2.96		2.96	2.96
Flaw Repair Line	0.39	0.39			4.36		0.25	0.51
Welding	6.60	6.60						
TOTAL	9.52	9.52	3.17	32.9	13.7	26.8	3.21	3.47