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

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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(317) 232-8603
(800) 451-6027
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June 4, 2004

TO: Interested Parties / Applicant

RE: Indiana Automotive Fastners, Inc / 059-18386-00024

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 9/16/03

June 4, 2004

Mr. Gary Berling
Indiana Automotive Fasteners, Inc.
1300 West Anderson Boulevard
Greenfield, IN 46140

Re: 059-18386-00024
Notice-only change to
MSOP 059-12739-00024

Dear Mr. Berling:

Indiana Automotive Fasteners, Inc. was issued a permit on February 5, 2001, for the operation of a stationary facility manufacturing nuts and bolts for the automotive industry. A letter requesting a permit modification for the addition of a tempering oven line was received on January 12, 2004.

Pursuant to the provisions of 326 IAC 2-6.1-6(d)(13), a notice-only change can be used for a modification that "adds an emissions unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3".

The additional emission units meet the above criteria. Therefore, the following notice-only changes are hereby approved. All additional information is indicated in bold type. All deleted information is struck-out.

1. Condition A.2:

Condition A.2 shall be changed as follows to include the proposed tempering oven line.

A.2 Emissions units and Pollution Control Equipment Summary
This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) Three (3) electric annealing ovens, identified as EU-1a, EU-1b, and EU-1c, constructed in 1996, and exhausting to stacks V1a and V1b;
.....

(z) One (1) Tempering Oven line for heat treatment of metal fasteners, consisting of a CO2 generator (EU-30) using natural gas at the rate of 0.078 mmBTU, and an electric tempering oven with a natural gas flame curtain and oil quench tank (EU-31), with a maximum capacity of 7000 lb/hr, and exhausting to stacks V30, V31A, V31B, and V31C.

2. Unit Description of Section D.1:

The unit description of Section D.1 shall be changed as follows to include the proposed tempering oven line.

Emissions Unit Description

(a) Three (3) electric annealing ovens, identified as EU-1a, EU-1b, and EU-1c, constructed in 1996, and exhausting to stacks V1a and V1b;

.....

(z) One (1) Tempering Oven line for heat treatment of metal fasteners, consisting of a CO2 generator (EU-30) using natural gas at the rate of 0.078 mmBTU, and an electric tempering oven with a natural gas flame curtain and oil quench tank (EU-31), with a maximum capacity of 7000 lb/hr, and exhausting to stacks V30, V31A, V31B, and V31C.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension 3-5691, or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF
cc: File - Hancock County
U.S. EPA, Region V
Hancock County Health Department
Air Compliance Section Inspector - D. J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Indiana Automotive Fasteners
1300 West Anderson Boulevard
Greenfield, Indiana 46140

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

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

Operation Permit No.: MSOP 059-12739-00024	Date Issued: February 5, 2001 Expiration Date: February 5, 2006
Issued by: Paul Dubenetzky, Branch Chief, Office of Air Quality	

First Notice Only Change No.: 059-15200-00024 Date Issued: January 30, 2002

Second Notice Only Change No: 059-18386-00024	Pages Modified: 5, 17, 18, 19, 20, and 21, with 5a added
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 4, 2004

(h) Two (2) natural gas fired dacrotizing ovens, identified as EU-9, and EU-9-1, constructed in 1996, each rated at 1.0 MMBtu/hr, and exhausting to stacks V9 and V9-1 respectively;

(i) One (1) electric zinc plating oven, identified as EU-10, constructed in 1996, and exhausting to stack V10;

(j) One (1) zinc plating/chromate treatment dip process, identified as EU-12, constructed in 1996, coating a maximum of 162,000 fasteners per hour, with packed fume scrubbers for control, and exhausting to stack v12;

(k) One (1) natural gas fired container wash oven, identified as EU-13, constructed in 1996, rated at 1.0 MMBtu/hr, and exhausting to stack V13;

(l) One (1) secondary metal treatment dip process with an electric oven, identified as EU-14, constructed in 1996, coating a maximum of 152,000 fasteners per hour, and exhausting to stacks V14 and V14-1;

(m) Two (2) natural gas fired boilers, identified as EU-15, and EU-15-1, constructed in 1996, each rated at 2.1 MMBtu/hr, and exhausting to stacks V15 and V15-1;

(n) One (1) natural gas fired boiler, identified as EU-16, rated at 1.2 MMBtu/hr, constructed in 1996, and exhausting to stack V16;

(o) One (1) dacrotizing metal treatment process, identified as EU-17, constructed in 1996, coating a maximum of 152,000 fasteners per hour;

(p) One (1) 7,000 gallon hydrochloric acid (HCL) storage tank, identified as EU-18, constructed in 1996, controlled by a scrubber, and exhausting to stack V18; and

(q) One (1) Plating treatment dip tank, identified as EU-19, constructed in 1996, coating a maximum of 162,000 fasteners per hour, and venting to stack V19.

(r) Two (2) shot blasting units, identified as EU-20a, and EU-20b, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;

(s) One (1) caustic wash and electric dry-off oven, identified as EU-21, and exhausting to stacks V21-A and V21-B;

(t) One (1) dip coating operation and electric dry-off oven, identified as EU-22, and exhausting to stacks V22-A and V22-B;

(u) One (1) top coating operation and electric dry-off oven, identified as EU-23, and exhausting to stacks V23-A and V23-B;

(v) One (1) natural gas CO_2 generator, identified as EU-24, and rated at 0.078 MMBtu/hr, and exhausting to stack V24; and

(w) One (1) electric tempering oven with a natural gas flame curtain and oil quench tank, identified as EU-25, rated at 0.01 MMBtu/hr, and exhausting to stack V25-B.

(x) One (1) BZ line for applying zinc and chrome coating to metal fasteners, including one (1) electric furnace, identified as EU-27, and a scrubber, identified as EU-26, with a maximum capacity of 3300 lb/hr, and exhausting to stacks V26 and V27;

(y) One (1) Tempering Oven line for heat treatment of metal fasteners, consisting of a CO2 generator (EU-28) using natural gas at the rate of 0.78 mmBTU, and an electric tempering oven with a natural gas flame curtain and oil quench tank (EU-29), with a maximum capacity of 7000 lb/hr, and exhausting to stacks V28, V29A, V29B, and V29C.

(z) One (1) Tempering Oven line for heat treatment of metal fasteners, consisting of a CO2 generator (EU-30) using natural gas at the rate of 0.078 mmBTU, and an electric tempering oven with a natural gas flame curtain and oil quench tank (EU-31), with a maximum capacity of 7000 lb/hr, and exhausting to stacks V30, V31A, V31B, and V31C.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

(a) Three (3) electric annealing ovens, identified as EU-1a, EU-1b, and EU-1c, constructed in 1996, and exhausting to stacks V1a and V1b;

(b) One (1) electric blueing oven, identified as EU-2, constructed in 1996, and exhausting to stacks V1c and V1d;

(c) Two (2) electric tempering ovens, identified as EU-3a and EU-3b, constructed in 1996, and exhausting to stacks V3a and V3b respectively;

(d) Two (2) electric quench oil ovens, identified as EU-4a and EU-4b, constructed in 1996, and exhausting to stacks V4a and V4b respectively;

(e) One (1) oil quench dip bath, identified as EU-4, constructed in 1996, quenching a maximum of 360,000 fasteners per hour, and exhausting to stacks V5 and V5a;

(f) Twenty-seven (27) head forming machines, identified as EU-6, constructed in 1996, each processing a maximum of 12,000 fasteners per hour, each controlled by a Smog Hog Electrostatic Precipitator, and all exhausting through ten (10) stacks (V6:3-7, 10-13, 15);

(g) Two (2) SBL shot blasters, identified as EU-8a and EU-8b, constructed in 1996, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;

(h) Two (2) natural gas fired dacrotizing ovens, identified as EU-9, and EU-9-1, constructed in 1996, each rated at 1.0 MMBtu/hr, and exhausting to stacks V9 and V9-1 respectively;

(i) One (1) electric zinc plating oven, identified as EU-10, constructed in 1996, and exhausting to stack V10;

(j) One (1) zinc plating/chromate treatment dip process, identified as EU-12, constructed in 1996, coating a maximum of 162,000 fasteners per hour, with packed fume scrubbers for control, and exhausting to stack v12;

(k) One (1) natural gas fired container wash oven, identified as EU-13, constructed in 1996, rated at 1.0 MMBtu/hr, and exhausting to stack V13;

(l) One (1) secondary metal treatment dip process with an electric oven, identified as EU-14, constructed in 1996, coating a maximum of 152,000 fasteners per hour, and exhausting to stacks V14 and V14-1;

(m) Two (2) natural gas fired boilers, identified as EU-15, and EU-15-1, constructed in 1996, each rated at 2.1 MMBtu/hr, and exhausting to stacks V15 and V15-1;

(n) One (1) natural gas fired boiler, identified as EU-16, rated at 1.2 MMBtu/hr, constructed in 1996, and exhausting to stack V16;

(o) One (1) dacrotizing metal treatment process, identified as EU-17, constructed in 1996, coating a maximum of 152,000 fasteners per hour;

(p) One (1) 7,000 gallon hydrochloric acid (HCL) storage tank, identified as EU-18, constructed in 1996, controlled by a scrubber, and exhausting to stack V18; and

(q) One (1) Plating treatment dip tank, identified as EU-19, constructed in 1996, coating a maximum of 162,000 fasteners per hour, and venting to stack V19.

(r) Two (2) shot blasting units, identified as EU-20a, and EU-20b, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;

(s) One (1) caustic wash and electric dry-off oven, identified as EU-21, and exhausting to stacks V21-A and V21-B;

(t) One (1) dip coating operation and electric dry-off oven, identified as EU-22, and exhausting to stacks V22-A and V22-B;

(u) One (1) top coating operation and electric dry-off oven, identified as EU-23, and exhausting to stacks V23-A and V23-B;

(v) One (1) natural gas CO_2 generator, identified as EU-24, and rated at 0.078 MMBtu/hr, and exhausting to stack V24; and

(w) One (1) electric tempering oven with a natural gas flame curtain and oil quench tank, identified as EU-25, rated at 0.01 MMBtu/hr, and exhausting to stack V25-B.

(x) One (1) BZ line for applying zinc and chrome coating to metal fasteners, including one (1) electric furnace, identified as EU-27, and a scrubber, identified as EU-26, with a maximum capacity of 3300 lb/hr, and exhausting to stacks V26 and V27;

(y) One (1) Tempering Oven line for heat treatment of metal fasteners, consisting of a CO2 generator (EU-28) using natural gas at the rate of 0.078 mmBTU, and an electric tempering oven with a natural gas flame curtain and oil quench tank (EU-29), with a maximum capacity of 7000 lb/hr, and exhausting to stacks V28, V29A, V29B, and V29C.

(z) One (1) Tempering Oven line for heat treatment of metal fasteners, consisting of a CO2 generator (EU-30) using natural gas at the rate of 0.078 mmBTU, and an electric tempering oven with a natural gas flame curtain and oil quench tank (EU-31), with a maximum capacity of 7000 lb/hr, and exhausting to stacks V30, V31A, V31B, and V31C.

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

Emission Limitations and Standards

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions for the two (2) natural gas fired boilers (EU-15, EU-15-1), and the one (1) natural gas fired boiler (EU-16) used for indirect heating purposes which were constructed after September 21, 1983 and for which the total source maximum operating capacity is less than or equal to 10 MMBtu/hr, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units of heat input. This value was based on the lesser of the following equation and 0.6 pounds per MMBtu:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter emitted per million Btu heat input
Q = total source maximum operating capacity rating in MMBtu per hour heat input

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the abrasive blasting operation (EU-8a, EU-8b) shall not exceed 3.45 pounds per hour when operating at a rate of 0.773 tons per hour. The allowable PM emission rate from the headforming machines (EU-6) shall not exceed 4.13 pounds per hour when operating at a rate of 1.0125 tons per hour. The allowable PM emission rate from the abrasive blasting operation (EU-20a, EU-20b) shall not exceed 3.46 pounds per hour when operating at a rate of 0.775 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

$E = 4.10\ P^{067}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]

Any change or modification which would increase the actual VOC usage from each of the one (1) zinc plating/chromate treatment dip process (identified as EU-12), the one (1) secondary metal treatment dip process (identified as EU-14), the one (1) dacrotizing metal treatment process (identified as EU-17), the one (1) plating treatment dip tank (identified as EU-19), and the one (1) dip coating operation (identified as EU-22) to fifteen (15) pounds per day or more, shall obtain prior approval from IDEM, OAM before such change takes place.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

Pursuant to CP 059-5331-00024, issued on September 12, 1996, the baghouse for PM control shall be in operation and control emissions from the abrasive blasting operation and all times that the abrasive blasting process is in operation. Also, the electrostatic precipitators for PM control shall be in operation and control emissions from the headforming machines at all times the headforming machines are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Visible Emissions Notations

(a) Visible emissions notations of the abrasive blasting and the headforming machines 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.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the abrasive blasting process, at least once per shift when the abrasive blasting process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specified otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 6.0 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.

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

D.1.7 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the abrasive blasting process 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. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) 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 shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. 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).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have ben 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 Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below for each of the following facilities: one (1) zinc plating/chromate treatment dip process (identified as EU-12), the one (1) secondary metal treatment dip process (identified as EU-14), the one (1) dacrotizing metal treatment process (identified as EU-17), the one (1) plating treatment dip tank (identified as EU-19), and the one (1) dip coating operation (identified as EU-22). Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limit established in Condition D.1.3.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each day; and

(4) The total VOC usage for each day.

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the abrasive blasting and headforming machines stack exhaust once per shift.

(b) To document compliance with Condition D.1.6 the Permittee shall maintain the following:

(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.

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