



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

February 6, 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: CME Automotive - Mitsuba / 003-18635-00330

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



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February 6, 2004

Mr. Michael D. Tuttle
CME Automotive - Mitsuba
21600 Monroeville Road
Monroeville, IN 46773

Dear Mr. Tuttle:

Re: Exempt Construction and Operation Status,
003-18635-00330

The application from CME Automotive - Mitsuba, received on January 22, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following emission unit, to be located at 21600 Monroeville Road, Monroeville, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) injection molding process for manufacturing automotive parts.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) Any change or modification that may increase the potential to emit of a single Hazardous Air Pollutant (HAP) to ten (10) tons per year or more, or that of Volatile Organic Compounds (VOC) or any combination of HAPs to twenty-five (25) tons per year or more, shall require prior approval of the Office of Air Quality (OAQ).

This exemption is the first air approval issued to this source.

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

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

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cc: File - Allen County
Allen County Health Department
Air Compliance – Jennifer Dorn
Permit Tracking
Compliance Data Section

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	CME Automotive - Mitsuba
Source Location:	21600 Monroeville Road, Monroeville, IN 46773
County:	Allen
SIC Code:	3711
Exemption No.:	003-18635-00330
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed an application from CME Automotive – Mitsuba, relating to the construction and operation of a automotive parts manufacturing facility.

Emission Units and Pollution Control Equipment

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

- (a) One (1) injection molding process for manufacturing automotive parts.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

A complete application for the purposes of this review was received on January 22, 2004.

Emission Calculations

The injection molding process uses the chemical Polyoxymethylene Copolymer. This chemical is not a VOC or a HAP. MSDS states that “formaldehyde is not a component but MAY be released if exposed to excessive heat”. According to information submitted by source, the decomposition temperature at which the material breaks down and releases formaldehyde is > 240 °C. The temperature of the chemical is raised to a maximum of 193 °C during the injection molding process.

Based on the above, emissions from injection molding process are estimated to be negligible.

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	Negligible
CO	Negligible
NO _x	Negligible

HAPs	Potential to Emit (tons/yr)
Single HAP	Negligible
Total	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	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. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Allen County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new 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 is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential to emit of all criteria pollutants at this source are less than 250 tons per year, and it is not one of the twenty-eight (28) listed source categories. Therefore, 326 IAC 2-2 does not apply.

326 IAC 2-6 (Emission Reporting)

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

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

The operation of the injection molding process will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

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

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

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Process Operations)

Manufacturing processes with potential PM emissions of less than 0.551 pounds per hour are exempt from the requirements of this rule. Therefore, 326 IAC 6-3-2 does not apply.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements)

The potential VOC emissions from the injection molding process is less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 20-25 (Styrene Rule)

Injection molding process is a closed molding type operation. Therefore, 326 IAC 20-25 does not apply.

Conclusion

The construction and operation of this injection molding of automotive parts shall be subject to the conditions of the Exemption No. 003-18635-00330.