



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: December 30, 2008

RE: Rightway Fasteners, Inc. / 005-18698-00048

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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.dot12/03/07



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## Minor Source Operating Permit OFFICE OF AIR QUALITY

**Rightway Fasteners, Inc.**  
**7945 South International Drive**  
**Columbus, Indiana 47201**

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

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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M 005-18698-00048	
Issued by: <i>Tripurari P. Sinha</i> Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 30, 2008  Expiration Date: December 30, 2013

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary metal products and fasteners manufacturing plant.

Source Address:	7945 South International Drive, Columbus, Indiana 47201
Mailing Address:	7945 South International Drive, Columbus, Indiana 47201
SIC Code:	3452, 3479
County Location:	Bartholemew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD 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

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

(a) Metal surface coating:

- (1) One (1) dip/spin coater and cure oven, identified as A-Line, constructed in 1991 (coater replaced in 2007), with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stack 1.
- (2) One (1) dip/spin coater and cure oven, identified as B-Line, constructed in 1991, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 3 and 4.
- (3) One (1) dip/spin coater and cure oven, identified as C-Line, constructed in 1993, with a maximum capacity 2,200 pounds of steel fasteners per hour, and the cure oven venting to stack 5.
- (4) One (1) dip/spin coater and cure oven, identified as D-Line, constructed in 2001, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 10, 11, and 12.
- (5) One (1) dip/spin coater and cure oven, identified as E-Line, constructed in 2006, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 6, 7, and 8.
- (6) One (1) dip/spin coater and cure oven, identified as Topcoater, constructed in 1993, with a maximum capacity 2,200 pounds of steel fasteners per hour, and the cure oven venting to stack 2.

(b) Degreasing Operations:

- (1) One (1) Sonicor model LDR-09 vapor degreaser for fasteners, associated with the A-Line, constructed in 2006, with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel fasteners per hour.
- (2) One (1) D-Line aqueous degreaser, constructed in 2003, with a capacity of 5,200 lbs of steel fasteners per hour.
- (3) One (1) natural gas-fired dryer, included in the D-Line aqueous degreaser, constructed in 2003, venting to stack 9.

(c) Heat Treating Operations:

- (1) One (1) heat treating furnace line, identified as HA-01, constructed in 1996, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 19, 20, 21, and 22.
- (2) One (1) heat treating furnace line, identified as HA-02, constructed in 1997, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 13, 14, 15, and 16.
- (3) One (1) heat treating furnace line, identified as HA-03, constructed in 2004, with a capacity 550 pounds of steel fasteners per hour, venting to stacks 23, 24, 25, and 26.
- (4) One (1) heat treating furnace line, identified as HA-04, constructed in 2005, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 27, 28, 29, and 30.
- (5) One (1) annealing furnace line, identified as HTA-01, constructed in 1996, with a capacity 730 pounds of steel fasteners per hour, venting to stacks 17 and 18.

(d) Plating operations, with a maximum line speed of 30 barrels per hour and a maximum loading of 110 pounds of steel fasteners per barrel:

- (1) Cleaning and alkaline non-cyanide zinc plating processes controlled by one (1) packed bed scrubber constructed in 1998 with air flow rate of 24,000 cubic feet per minute (CFM), venting to stack 32, including:
  - (A) Two (2) degreasing tanks, designated as #1 and #2 Degreasers, constructed in 1998, with capacities of 370 and 690 gallons, respectively.
  - (B) One (1) alkaline electrocleaning tank, constructed in 1998, with a maximum capacity of 317 gallons.
  - (C) One (1) alkaline non-cyanide zinc electroplating tank, constructed in 1998, with a maximum capacity of 4,100 gallons.
- (2) Hydrochloric acid pickling and related processes controlled by one (1) packed bed scrubber constructed in 1998 with air flow rate of 15,500 cubic feet per minute (CFM), venting to stack 33, including:
  - (A) One (1) pickling tank, designated as #1, constructed in 1998, each with a working capacity of 285 gallons.

- (B) Two (2) acid electrocleaning tanks, designated as #1 Acid Electrocleaning, constructed in 1998, and #2 Acid Electrocleaning, converted to acid electrocleaning in 2000, with working capacities of 330 and 317 gallons, respectively.
  - (C) One (1) acid storage tank, constructed in 1998, with a capacity of 6,500 gallons.
  - (3) One (1) automated chromate coating system, constructed in 1998, including:
    - (A) Four (4) air-agitated coating tanks;
    - (B) Four (4) sets of two (2) counterflow rinse tanks;
    - (C) One (1) static sealer tank (not in service); and
    - (D) One (1) air-agitated sealer tank.
- Each of the above tanks has a capacity of 120 gallons. The chromate coating system is a conversion coating process, in which no electrical current is applied. The chromium-containing mists from the coating processes are controlled by one (1) composite mesh pad mist eliminator with an air flow rate of 6,000 cubic feet per minute (CFM), venting to stack 31.
- (4) One (1) natural gas-fired boiler, constructed in 1998, with a heat input of 1.5 MMBtu/hr, venting to stack 34.
  - (e) Blasting, grinding and machining operations, venting to stacks 13 through 30:
    - (1) Eight (8) steel shotblasting machines:
      - (A) One (1) steel shotblasting machine, identified as SBA-01, constructed in 1991, capable of processing 1,920 pounds per hour.
      - (B) One (1) steel shotblasting machine, identified as SBA-02, constructed in 1993, capable of processing 1,920 pounds per hour.
      - (C) One (1) steel shotblasting machine, identified as SBA-03, constructed in 1997, capable of processing 960 pounds per hour.
      - (D) One (1) steel shotblasting machine, identified as SBA-05, constructed in 2001, capable of processing 1,920 pounds per hour.
      - (E) One (1) steel shotblasting machine, identified as SBA-06, constructed in 2005, capable of processing 360 pounds per hour.
      - (F) One (1) steel shotblasting machine, identified as SBA-07, constructed in 2006, capable of processing 960 pounds per hour.
      - (G) One (1) steel shotblasting machine, identified as SBA-08, constructed in 2008, capable of processing 1,920 pounds per hour.
      - (H) One (1) steel shotblasting machine, identified as SBA-09, constructed in 1993, capable of processing 300 pounds per hour.

- (2) One (1) sand blasting machine, identified as SBA-04, constructed in 2003, capable of processing 480 pounds per hour.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-1.1-1]**

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

### **B.2 Permit Term [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]**

- 
- (a) This permit, M 005-18698-00048, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-1.1-5]**

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5 Severability [326 IAC 2-1.1-5]**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-1.1-5]**

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This permit does not convey any property rights of any sort or any exclusive privilege.

### **B.7 Duty to Provide Information [326 IAC 2-1.1-2] [326 IAC 2-1.1-5]**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Certification [326 IAC 2-1.1-5]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual 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) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, IN 46204-2251
- (c) 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.10 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-1.1-5]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M 005-18698-00048 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.13 Permit Renewal [326 IAC 2-6.1-7]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
  - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

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

**B.15 Source Modification Requirement**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

**B.16 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]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.18 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.19 Credible Evidence [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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 to 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52, IGCN 1003  
Indianapolis, Indiana 46204-2251

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 2-1.1-1(1).

- (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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

### **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

#### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

#### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

#### **C.12 Instrument Specifications [326 IAC 2-1.1-11]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

### **Corrective Actions and Response Steps**

#### **C.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.14 Malfunctions Report [326 IAC 1-6-2]**

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

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

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

C.15 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 within ninety (90) days of permit issuance.

C.16 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  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251
- (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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by 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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description

Metal surface coating.

- (1) One (1) dip/spin coater and cure oven, identified as A-Line, constructed in 1991 (coater replaced in 2007), with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stack 1.
- (2) One (1) dip/spin coater and cure oven, identified as B-Line, constructed in 1991, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 3 and 4.
- (3) One (1) dip/spin coater and cure oven, identified as C-Line, constructed in 1993, with a maximum capacity 2,200 pounds of steel fasteners per hour, and the cure oven venting to stack 5.
- (4) One (1) dip/spin coater and cure oven, identified as D-Line, constructed in 2001, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 10, 11, and 12.
- (5) One (1) dip/spin coater and cure oven, identified as E-Line, constructed in 2006, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 6, 7, and 8.
- (6) One (1) dip/spin coater and cure oven, identified as Topcoater, constructed in 1993, with a maximum capacity 2,200 pounds of steel fasteners per hour, and the cure oven venting to stack 2.

(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 [326 IAC 2-6.1-5(a)(1)]

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

- (a) The Permittee shall not allow the discharge of VOC into the atmosphere in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators of the dip/spin coaters, identified as A-Line, B-Line, C-Line, D-Line, E-Line, and Topcoater.
- (b) All solvents applied to the application equipment of the dip/spin coaters during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent application is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

### Compliance Determination Requirements

#### D.1.2 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, 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 and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

### **D.1.3 Record Keeping Requirements**

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- (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 monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.
  - (1) The VOC content less water of each coating material and solvent used.
  - (2) The amount of coating material and solvent used.
    - (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 cleanup solvent usage for each month; and
  - (4) The total VOC usage for each month.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description

#### Degreasing Operations:

- (1) One (1) Sonicator model LDR-09 vapor degreaser for fasteners, associated with the B-Line, constructed in 2006, with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel fasteners per hour.
- (2) One (1) D-Line aqueous degreaser, constructed in 2003, with a capacity of 5,200 lbs of steel fasteners per hour.
- (3) One (1) natural gas-fired dryer, included in the D-Line aqueous degreaser, constructed in 2003, venting to stack 9.

(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 [326 IAC 2-6.1-5(a)(1)]

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations constructed after January 1, 1980, including the Sonicator model LDR-09 vapor degreaser, the Permittee shall:

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

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

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

**D.2.2 Record Keeping Requirements [326 IAC 2-6.1-5(a)(2)]**

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- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with Condition D.3.1.
  - (1) The VOC and HAP content of the degreaser used.
  - (2) The amount of VOC used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The volume weighted VOC and HAP content of the degreaser used for each day.
  - (4) The total VOC and HAP usage for each day.
- (b) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description

Heat Treating Operations:

- (1) One (1) heat treating furnace line, identified as HA-01, constructed in 1996, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 19, 20, 21, and 22.
- (2) One (1) heat treating furnace line, identified as HA-02, constructed in 1997, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 13, 14, 15, and 16.
- (3) One (1) heat treating furnace line, identified as HA-03, constructed in 2004, with a capacity 550 pounds of steel fasteners per hour, venting to stacks 23, 24, 25, and 26.
- (4) One (1) heat treating furnace line, identified as HA-04, constructed in 2005, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 27, 28, 29, and 30.
- (5) One (1) annealing furnace line, identified as HTA-01, constructed in 1996, with a capacity 730 pounds of steel fasteners per hour, venting to stacks 17 and 18.

(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 [326 IAC 2-6.1-5(a)(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the heat treating operations shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description

Plating operations, with a maximum line speed of 30 barrels per hour and a maximum loading of 110 pounds of steel fasteners per barrel:

- (1) Cleaning and alkaline non-cyanide zinc plating processes controlled by one (1) packed bed scrubber constructed in 1998 with air flow rate of 24,000 cubic feet per minute (CFM), venting to stack 32, including:
  - (A) Two (2) degreasing tanks, designated as #1 and #2 Degreasers, constructed in 1998, with capacities of 370 and 690 gallons, respectively.
  - (B) One (1) alkaline electrocleaning tank, constructed in 1998, with a maximum capacity of 317 gallons.
  - (C) One (1) alkaline non-cyanide zinc electroplating tank, constructed in 1998, with a maximum capacity of 4,100 gallons.
- (2) Hydrochloric acid pickling and related processes controlled by one (1) packed bed scrubber constructed in 1998 with air flow rate of 15,500 cubic feet per minute (CFM), venting to stack 33, including:
  - (A) One (1) pickling tank, designated as #1, constructed in 1998, each with a working capacity of 285 gallons.
  - (B) Two (2) acid electrocleaning tanks, designated as #1 Acid Electrocleaning, constructed in 1998, and #2 Acid Electrocleaning, converted to acid electrocleaning in 2000, with working capacities of 330 and 317 gallons, respectively.
  - (C) One (1) acid storage tank, constructed in 1998, with a capacity of 6,500 gallons.
- (3) One (1) automated chromate coating system, constructed in 1998, including:
  - (A) Four (4) air-agitated coating tanks; and
  - (B) Four (4) rinse and sealer tank sets including:
    - (i) Two (2) counterflow rinse tanks;
    - (ii) One (1) static sealer tank; and
    - (iii) One (1) air-agitated sealer tank.

Each of the above tanks has a capacity of 120 gallons. The chromate coating system is a conversion coating process, in which no electrical current is applied. The chromium-containing mists from the coating processes are controlled by one (1) composite mesh pad mist eliminator with an air flow rate of 6,000 cubic feet per minute (CFM), venting to stack 31.
- (4) One (1) natural gas-fired boiler, constructed in 1998, with a heat input of 1.5 MMBtu/hr, venting to stack 34.

(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 [326 IAC 2-6.1-5(a)(1)]**

#### **D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]**

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Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the plating operations, including the alkaline zinc electroplating line, hydrochloric acid pickling and related processes, and chromate coating system, shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

#### **D.4.2 Particulate Matter (PM) [326 IAC 6-2-4]**

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Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the one (1) natural gas fired boiler shall be limited to 0.6 pounds per MMBtu heat input.

### **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

#### **D.4.3 Particulate Matter**

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Pursuant to 326 IAC 6-3-2(c), the packed bed scrubbers for PM control shall be in operation at all times when the alkaline zinc electroplating line, hydrochloric acid pickling and related processes, and chromate coating system are in operation.

## SECTION D.5

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description

Blasting, grinding and machining operations, venting to stacks 13 through 30:

- (1) Eight (8) steel shotblasting machines:
  - (A) One (1) steel shotblasting machine, identified as SBA-01, constructed in 1991, capable of processing 1,920 pounds per hour.
  - (B) One (1) steel shotblasting machine, identified as SBA-02, constructed in 1993, capable of processing 1,920 pounds per hour.
  - (C) One (1) steel shotblasting machine, identified as SBA-03, constructed in 1997, capable of processing 960 pounds per hour.
  - (D) One (1) steel shotblasting machine, identified as SBA-05, constructed in 2001, capable of processing 1,920 pounds per hour.
  - (E) One (1) steel shotblasting machine, identified as SBA-06, constructed in 2005, capable of processing 360 pounds per hour.
  - (F) One (1) steel shotblasting machine, identified as SBA-07, constructed in 2006, capable of processing 960 pounds per hour.
  - (G) One (1) steel shotblasting machine, identified as SBA-08, constructed in 2008, capable of processing 1,920 pounds per hour.
  - (H) One (1) steel shotblasting machine, identified as SBA-09, constructed in 1993, capable of processing 300 pounds per hour.
- (2) One (1) sand blasting machine, identified as SBA-04, constructed in 2003, capable of processing 480 pounds per hour.

(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 [326 IAC 2-6.1-5(a)(1)]

#### D.5.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the blasting operations shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

**Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

D.5.2 Particulate Matter (PM)

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The dust collectors used to control particulate matter shall be in operation at all times when the grinding and machining processes are in operation.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### MINOR SOURCE OPERATING PERMIT CERTIFICATION

Source Name: Rightway Fasteners, Inc.  
Source Address: 7945 South International Drive, Columbus, Indiana 47201  
Mailing Address: 7945 South International Drive, Columbus, Indiana 47201  
Permit No.: M 005-18698-00048

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify): \_\_\_\_\_
- Report (specify): \_\_\_\_\_
- Notification (specify): \_\_\_\_\_
- Affidavit (specify): \_\_\_\_\_
- Other (specify): \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**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).

Source Name: Rightway Fasteners, Inc.  
Source Address: 7945 South International Drive, Columbus, Indiana 47201  
Mailing Address: 7945 South International Drive, Columbus, Indiana 47201  
Permit No.: M 005-18698-00048

<b>CERTIFICATION</b>	
<input type="checkbox"/> I hereby certify that Rightway Fasteners, Inc. is	<input type="checkbox"/> still in operation. <input type="checkbox"/> no longer in operation.
<input type="checkbox"/> I hereby certify that Rightway Fasteners, Inc. is	<input type="checkbox"/> in compliance with the requirements of MSOP <u>005-18698-00048</u> . <input type="checkbox"/> not in compliance with the requirements of MSOP <u>005-18698-00048</u> .
Signature:	
Printed Name:	
Title/Position:	
Phone:	
Date:	

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
FAX NUMBER - 317-233-6865

**MALFUNCTION REPORT**

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT

- 25 TONS/YEAR PARTICULATE MATTER
- 25 TONS/YEAR SULFUR DIOXIDE
- 25 TONS/YEAR NITROGEN OXIDES
- 25 TONS/YEAR VOC
- 25 TONS/YEAR HYDROGEN SULFIDE
- 25 TONS/YEAR TOTAL REDUCED SULFUR
- 25 TONS/YEAR REDUCED SULFUR COMPOUNDS
- 25 TONS/YEAR FLUORIDES
- 100TONS/YEAR CARBON MONOXIDE
- 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT
- 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT
- 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD
- OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2)
- EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION

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

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

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

COMPANY: Rightway Fasteners, Inc. PHONE NO. (\_\_\_\_) \_\_\_\_ - \_\_\_\_  
LOCATION: (CITY AND COUNTY) Columbus, Indiana Bartholomew County  
PERMIT NO. 005-18698-00048 AFS PLANT ID: \_\_\_\_\_  
AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_\_ AM PM  
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_  
DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE: \_\_\_\_\_ AM PM  
TYPE OF POLLUTANTS EMITTED:  TSP  PM<sub>10</sub>  SO<sub>2</sub>  VOC  OTHER: \_\_\_\_\_

**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.**

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:

\_\_\_\_\_  
(SIGNATURE IF FAXED)

TITLE: \_\_\_\_\_

MALFUNCTION RECORDED BY:

\_\_\_\_\_

DATE: \_\_\_\_\_ AM PM

**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

Technical Support Document (TSD)  
for a Part 70 Source transitioning to a Minor Source Operating Permit (MSOP)

### Source Background and Description

Source Name: Rightway Fasteners, Inc.  
Source Location: 7945 South International Drive, Columbus, Indiana 47201  
County: Bartholemew  
SIC Code: 3452, 3479  
Permit No.: M 005-18698-00048  
Permit Reviewer: Kimberly Cottrell

The Office of Air Quality (OAQ) has reviewed the operating permit application from Rightway Fasteners, Inc. relating to the operation of a stationary metal products and fasteners manufacturing plant.

### History and Existing Approvals

On March 18, 2004, Rightway Fasteners, Inc. submitted an application to the OAQ requesting to renew its Part 70 operating permit. Since the issuance of the Part 70 Operating Permit No. T 005-7301-00048 on March 18, 1999, the source has constructed or has been operating under the following approvals:

- (a) Permit Reopening No. T 005-13153-00048 issued on December 31, 2001;
- (b) Minor Source Modification No. T 005-21382-00048 issued on September 27, 2005;
- (c) Minor Permit Modification No. T 005-21625-00048 issued on January 4, 2006;
- (d) Minor Source Modification No. T 005-22422-00048 issued on February 3, 2006; and
- (e) Minor Permit Modification No. T 005-22549-00048 issued on March 31, 2006.

### Permitted Emission Units and Pollution Control Equipment

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

- (a) Metal surface coating:
  - (1) One (1) dip/spin coater and cure oven, identified as A-Line, constructed in 1991 (coater replaced in 2007), with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stack 1.
  - (2) One (1) dip/spin coater and cure oven, identified as B-Line, constructed in 1991, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 3 and 4.

- (3) One (1) dip/spin coater and cure oven, identified as C-Line, constructed in 1993, with a maximum capacity 2,200 pounds of steel fasteners per hour, and the cure oven venting to stack 5.
  - (4) One (1) dip/spin coater and cure oven, identified as D-Line, constructed in 2001, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 10, 11, and 12.
  - (5) One (1) dip/spin coater and cure oven, identified as E-Line, constructed in 2006, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 6, 7, and 8.
  - (6) One (1) dip/spin coater and cure oven, identified as Topcoater, constructed in 1993, with a maximum capacity 2,200 pounds of steel fasteners per hour, and the cure oven venting to stack 2.
- (b) Degreasing Operations:
- (1) One (1) Sonicor model LDR-09 vapor degreaser for fasteners, associated with the A-Line, constructed in 2006, with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel fasteners per hour.
  - (2) One (1) D-Line aqueous degreaser, constructed in 2003, with a capacity of 5,200 lbs of steel fasteners per hour.
  - (3) One (1) natural gas-fired dryer, included in the D-Line aqueous degreaser, constructed in 2003, venting to stack 9.
- (c) Heat Treating Operations:
- (1) One (1) heat treating furnace line, identified as HA-01, constructed in 1996, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 19, 20, 21, and 22.
  - (2) One (1) heat treating furnace line, identified as HA-02, constructed in 1997, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 13, 14, 15, and 16.
  - (3) One (1) heat treating furnace line, identified as HA-03, constructed in 2004, with a capacity 550 pounds of steel fasteners per hour, venting to stacks 23, 24, 25, and 26.
  - (4) One (1) heat treating furnace line, identified as HA-04, constructed in 2005, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 27, 28, 29, and 30.
  - (5) One (1) annealing furnace line, identified as HTA-01, constructed in 1996, with a capacity 730 pounds of steel fasteners per hour, venting to stacks 17 and 18.
- (d) Plating operations, with a maximum line speed of 30 barrels per hour and a maximum loading of 110 pounds of steel fasteners per barrel:
- (1) Cleaning and alkaline non-cyanide zinc plating processes controlled by one (1) packed bed scrubber constructed in 1998 with air flow rate of 24,000 cubic feet per minute (CFM), venting to stack 32, including:

- (A) Two (2) degreasing tanks, designated as #1 and #2 Degreasers, constructed in 1998, with capacities of 370 and 690 gallons, respectively.
  - (B) One (1) alkaline electrocleaning tank, constructed in 1998, with a maximum capacity of 317 gallons.
  - (C) One (1) alkaline non-cyanide zinc electroplating tank, constructed in 1998, with a maximum capacity of 4,100 gallons.
- (2) Hydrochloric acid pickling and related processes controlled by one (1) packed bed scrubber constructed in 1998 with air flow rate of 15,500 cubic feet per minute (CFM), venting to stack 33, including:
- (A) One (1) pickling tank, designated as #1, constructed in 1998, each with a working capacity of 285 gallons.
  - (B) Two (2) acid electrocleaning tanks, designated as #1 Acid Electrocleaning, constructed in 1998, and #2 Acid Electrocleaning, converted to acid electrocleaning in 2000, with working capacities of 330 and 317 gallons, respectively.
  - (C) One (1) acid storage tank, constructed in 1998, with a capacity of 6,500 gallons.
- (3) One (1) automated chromate coating system, constructed in 1998, including:
- (A) Four (4) air-agitated coating tanks;
  - (B) Four (4) sets of two (2) counterflow rinse tanks;
  - (C) One (1) static sealer tank (not in service); and
  - (D) One (1) air-agitated sealer tank.
- Each of the above tanks has a capacity of 120 gallons. The chromate coating system is a conversion coating process, in which no electrical current is applied. The chromium-containing mists from the coating processes are controlled by one (1) composite mesh pad mist eliminator with an air flow rate of 6,000 cubic feet per minute (CFM), venting to stack 31.
- (4) One (1) natural gas-fired boiler, constructed in 1998, with a heat input of 1.5 MMBtu/hr, venting to stack 34.
- (e) Blasting, grinding and machining operations, venting to stacks 13 through 30:
- (1) Eight (8) steel shotblasting machines:
    - (A) One (1) steel shotblasting machine, identified as SBA-01, constructed in 1991, capable of processing 1,920 pounds per hour.
    - (B) One (1) steel shotblasting machine, identified as SBA-02, constructed in 1993, capable of processing 1,920 pounds per hour.
    - (C) One (1) steel shotblasting machine, identified as SBA-03, constructed in 1997, capable of processing 960 pounds per hour.

- (D) One (1) steel shotblasting machine, identified as SBA-05, constructed in 2001, capable of processing 1,920 pounds per hour.
  - (E) One (1) steel shotblasting machine, identified as SBA-06, constructed in 2005, capable of processing 360 pounds per hour.
  - (F) One (1) steel shotblasting machine, identified as SBA-07, constructed in 2006, capable of processing 960 pounds per hour.
  - (G) One (1) steel shotblasting machine, identified as SBA-08, constructed in 2008, capable of processing 1,920 pounds per hour.
  - (H) One (1) steel shotblasting machine, identified as SBA-09, constructed in 1993, capable of processing 300 pounds per hour.
- (2) One (1) sand blasting machine, identified as SBA-04, constructed in 2003, capable of processing 480 pounds per hour.

**Emission Units and Pollution Control Equipment Removed From the Source**

- (a) The following emission units that have been removed from the source since issuance of the Part 70 Operating Permit No. T 005-7301-00048 on March 18, 1999:
- (1) One (1) Tanabe Kakoki Co. conveyORIZED in-line dichloromethane degreaser (ID A-Line) for disc brake rotors, installed in 1991, with a daily solvent consumption of 55 gallons per day.
  - (2) One (1) Tanabe Kakoki Co. in-line conveyORIZED dichloromethane degreaser (ID B-Line) for fasteners, installed in 1991, with a daily solvent consumption of 20 gallons per day.
  - (3) One (1) Trinity Industrial Corp. in-line conveyORIZED dichloromethane degreaser (ID C-Line) for general parts, installed in 1993, with a daily solvent consumption of 13 gallons per day.
  - (4) One (1) glass bead blasting machine, capable of using 1,016 pounds of glass bead media per hour.
  - (5) One (1) natural gas-fired boiler, with a heat input of 1.39 MMBtu/hr.
- (b) The following emission unit was converted to the acid electrocleaning process in 2000:
- (1) One (1) pickling tank designated as #2, with a capacity of 317 gallons.

**Emission Units not yet Incorporated into an Operating Permit**

- (a) The stationary source added the following insignificant activities since issuance of the Part 70 Operating Permit No. T 005-7301-00048 on March 18, 1999:
- (1) One (1) D-Line aqueous degreaser, constructed in 2003, with a capacity of 5,200 lbs of steel fasteners per hour.

- (2) One (1) natural gas-fired dryer, included in the D-Line aqueous degreaser, constructed in 2003, venting to stack 9.
  - (3) One (1) heat treating furnace line, identified as HA-03, constructed in 2004, with a capacity 550 pounds of steel fasteners per hour, venting to stacks 23, 24, 25, and 26.
  - (4) One (1) heat treating furnace line, identified as HA-04, constructed in 2005, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 27, 28, 29, and 30.
- (b) The stationary source also consists of the following emission units that received construction approval, but were not included in the Part 70 Operating Permit No. T 005-7301-00048, issued on March 18, 1999:
- (1) One (1) dip/spin coater and cure oven, identified as B-Line, constructed in 1991, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 3 and 4. [Construction Permit No. CP 005-2154-00048]
  - (2) One (1) dip/spin coater and cure oven, identified as A-Line, constructed in 1991, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stack 1. [Construction Permit No. CP 005-2154-00048]

#### **Emission Units Constructed and Operated Without a Permit**

The stationary source also consists of the following emission units that were constructed and operated without a permit:

- (1) One (1) dip/spin coater and cure oven, identified as D-Line, constructed in 2001, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 10, 11, and 12.
- (2) Replacement of one (1) dip/spin coater, associated with the A-Line, constructed in 1991 (replaced in 2007), with a maximum capacity 4,000 pounds of steel fasteners per hour.

An application for the modification to add the D-Line was submitted on July 13, 2005. This application for Significant Source Modification No. T 005-21448-00048 was combined with the application for renewal of the Part 70 Operating Permit, 005-18698-00048, which will be issued as an initial MSOP.

An application for the modification to replace the A-Line coater was submitted on January 22, 2007. This application for Administrative Amendment No. T 005-24234-00048 was combined with the application for renewal of the Part 70 Operating Permit, 005-18698-00048, which will be issued as an initial MSOP.

#### **Enforcement Issue**

There are no enforcement actions pending.

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

**County Attainment Status**

The source is located in Bartholemew County.

<b>Pollutant</b>	<b>Designation</b>
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Bartholemew County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(b) PM<sub>2.5</sub>

Bartholemew County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

(c) Bartholemew County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (d) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

<b>Unrestricted Potential Emissions</b>
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This table reflects the unrestricted potential emissions of the source.

<b>Table 2: Unrestricted Potential Emissions</b>	
<b>Pollutant</b>	<b>Emissions (ton/yr)</b>
CO	6.50
NO <sub>x</sub>	7.90
PM	10.59
PM <sub>10</sub>	10.59
PM <sub>2.5</sub>	10.59
SO <sub>2</sub>	0.05
VOC	43.32
HAP Methanol	7.55
HAP Chromium	0.0004
Total HAP	10.27

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based upon calculations provided in Appendix A of this document.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP
- (e) 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.
- (f) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

<b>Federal Rule Applicability Determination</b>
---

The following federal rules are applicable to the source:

- (a) National Emission Standards for Hazardous Air Pollutants (NESHAPs)  
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 61) included in the permit.
- (b) New Source Performance Standards (NSPS)  
There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.
- (c) National Emission Standards for Hazardous Air Pollutants (NESHAPs)  
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 20 and 40 CFR Part 63) included in the permit.
  - (1) The three (3) dichloromethane degreasers were removed in 2001. The current degreasing activities use less than 1% of HAP containing material annually. Therefore, the requirements of National Emission Standards for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) are no longer applicable to the source.
  - (2) The initial compliance date for the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M) was January 2, 2004. The source was no longer considered a major source under Section 112 of the Clean Air Act after removal of the dichloromethane degreasers in 2001; therefore the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M) are not applicable to the surface coating operations at this source.
  - (3) The National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart H) were promulgated on January 2, 2008. If applicable, this source would need to comply with the requirements on and after the initial compliance date of January 10, 2011, and a significant permit revision to incorporate these requirements would be due to IDEM by September 10, 2010. The initial notification for 40 CFR Part 63, Subpart H is due to the IDEM Compliance Branch on January 11, 2010.
  - (3) The National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart H) were promulgated on January 2, 2008. If applicable, this source would need to comply with the requirements on and after the initial compliance date of January 10, 2011, and a significant permit revision to incorporate these requirements would be due to IDEM by September 10, 2010. The initial notification for 40 CFR Part 63, Subpart H is due to the IDEM Compliance Branch on January 11, 2010.
  - (4) The chromate coating system is a chemical process that adds a chromium-containing corrosion-resistant film to the zinc plated steel fasteners. This conversion coating system is not an electrochemical process and no electrical current is applied; therefore, the requirements of National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) are not applicable to the source.

### State Rule Applicability - Entire Source

The following state rules are applicable to the source:

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

The source is subject to 326 IAC 1-6-3.

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

The source is subject to 326 IAC 1-5-2.

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

This source is located in Bartholemew County and the potential to emit of each criteria pollutant 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 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.

#### **326 IAC 6-4 (Fugitive Dust Emissions)**

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated pursuant to 326 IAC 6-4-5(c). Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM.

#### **326 IAC 9 (Carbon Monoxide Emission Limits)**

Pursuant to 326 IAC 9 (Carbon Monoxide Emission Limits), the source is subject to this rule because it is a stationary source which emits CO emissions and commenced operation after March 21, 1972. Under this rule, there is not a specific emission limit because the source is not an operation listed under 326 IAC 9-1-2.

### State Rule Applicability – Individual Facilities

The following state rules are applicable to specified emission units at the source:

#### **326 IAC 2-2 (PSD)**

PSD applicability is discussed under the Unrestricted Potential Emissions section.

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

The operations will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### **326 IAC 6-2 (Particulate Emissions Limitations for Source of Indirect Heating)**

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions from the natural gas fired boilers shall be limited to 0.6 pounds per MMBtu heat input.

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the electroplating line, chromate coating system, heat treating, and blasting operations shall not exceed the pounds per hour emission limitations in the following table when operating at the specified process weight rates:

<b>Process / Emission Unit</b>	<b>P (ton/hr)</b>	<b>E (lb/hr)</b>
electroplating line	1.65	5.73
chromate coating system	1.65	5.73
heat treating operations	3.94	10.27
blasting operations	5.37	12.64

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

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

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

The packed bed scrubber, composite mesh pad mist eliminator, and dust collectors shall be in operation at all times the associated processes are in operation, in order to comply with these limits.

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

The Permittee shall not allow the discharge of VOC into the atmosphere in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators of the dip/spin coaters, identified as A-Line, B-Line, C-Line, D-Line, E-Line, and Topcoater.

All solvents applied to the application equipment of the dip/spin coaters during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent application is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

**326 IAC 8-3-3 (Organic Solvent Degreasing Operations)**

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations constructed after January 1, 1980, including the Sonikor model LDR-09 vapor degreaser, the Permittee shall:

- (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;
- (c) Minimize solvent carry-out by:
  - (1) Racking parts to allow complete drainage;
  - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
  - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;

- (4) Tipping out any pools of solvent on the cleaned parts before removal;
- (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

#### **Conclusion**

The operation of this stationary metal products and fasteners manufacturing plant shall be subject to the conditions of the attached MSOP No. M 005-18698-00048.

#### **Recommendation**

The staff recommends to the Commissioner that the MSOP 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 renewal of the Part 70 Operating Permit was received on March 18, 2004. On January 18, 2007, Rightway Fasteners, Inc. requested to transition from a Part 70 Operating Permit to a Minor Source Operating Permit. Additional information was received on February 8, 2007, February 9, 2007, February 15, 2007, February 27, 2007, April 22, 2008, July 17, 2008, and November 10, 2008.

<b>IDEM Contact</b>
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Questions regarding this proposed permit can be directed to:

Kimberly Cottrell  
Indiana Department Environmental Management  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53, Room 1003  
Indianapolis, Indiana 46204-2251  
Toll free (within Indiana): 1-800-451-6027 extension 3-0870  
Or dial directly: (317) 233-0870  
kcottrel@idem.in.gov

Please refer to MSOP No. M 005-18698-00048 in all correspondence.

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

Appendix A – Emission Calculations  
Technical Support Document (TSD)  
Minor Source Operating Permit

**Source Description and Location**

Company Name: Rightway Fasteners, Inc.  
Address City IN Zip: 7945 South International Drive, Columbus, Indiana 47201  
County: Bartholemew  
SIC Code: 3452, 3479  
Permit Number: M 005-18698-00048  
Permit Reviewer: Kimberly Cottrell  
Date: November 21, 2008

**Summary of Potential to Emit**

The tables below summarize the potential to emit calculations submitted by Rightway Fasteners, Inc. The subsequent pages of this document contain the calculations provided by Rightway Fasteners, Inc. IDEM has reviewed these calculations and verified their accuracy.

Process / Emission Unit	Uncontrolled Potential To Emit (ton/yr)								
	CO	NO <sub>x</sub>	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	Single HAP	Single HAP Name	Combination HAPs
Geomet 720 LV (A-Line)	-	-	-	-	-	5.39	1.89	Methanol	1.89
Geomet 720 LV (B-Line)	-	-	-	-	-	5.39	1.89	Methanol	1.89
Geomet 720 LV (D-Line)	-	-	-	-	-	5.39	1.89	Methanol	1.89
Geomet 720 LV (E-Line)	-	-	-	-	-	5.39	1.89	Methanol	1.89
Neotorquer (topcoater)	-	-	-	-	-	0.43	-		-
Neotorquer B-2 (C-Line)	-	-	-	-	-	0.43	-		-
Degreasing (coating operations)	-	-	-	-	-	10.18	-		-
Bromopropane Degreasing	-	-	-	-	-	10.31	0.206	1,2 Epoxybutane; Acetonitrile	0.412
Dacro Ovens (combustion)	2.09	2.54	0.19	0.19	0.02	0.14	-		-
Heat Treating	3.85	4.70	2.63	2.63	0.03	0.26	-		-
Boiler	0.55	0.66	0.05	0.05	0.004	0.04	-		-
Zinc Plating	-	-	7.71	7.71	-	-	0.0004	Chromium	0.0004
<b>Totals:</b>	<b>6.50</b>	<b>7.90</b>	<b>10.59</b>	<b>10.59</b>	<b>0.05</b>	<b>43.32</b>	<b>7.55</b>	<b>Methanol</b>	<b>7.96</b>

Process / Emission Unit	Limited Potential To Emit (ton/yr)								
	CO	NO <sub>x</sub>	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	Single HAP	Single HAP Name	Combination HAPs
Geomet 720 LV (A-Line)	-	-	-	-	-	5.39	1.89	Methanol	1.89
Geomet 720 LV (B-Line)	-	-	-	-	-	5.39	1.89	Methanol	1.89
Geomet 720 LV (D-Line)	-	-	-	-	-	5.39	1.89	Methanol	1.89
Geomet 720 LV (E-Line)	-	-	-	-	-	5.39	1.89	Methanol	1.89
Neotorquer (topcoater)	-	-	-	-	-	0.43	-		-
Neotorquer B-2 (C-Line)	-	-	-	-	-	0.43	-		-
Degreasing (coating operations)	-	-	-	-	-	10.18	-		-
Bromopropane Degreasing	-	-	-	-	-	10.31	0.206	1,2 Epoxybutane; Acetonitrile	0.412
Dacro Ovens (combustion)	2.09	2.54	0.19	0.19	0.02	0.14	-		-
Heat Treating	3.85	4.70	2.63	2.63	0.03	0.26	-		-
Boiler	0.55	0.66	0.05	0.05	0.004	0.04	-		-
Zinc Plating	-	-	7.71	7.71	-	-	0.0004	Chromium	0.0004
<b>Totals:</b>	<b>6.50</b>	<b>7.90</b>	<b>10.59</b>	<b>10.59</b>	<b>0.05</b>	<b>43.32</b>	<b>7.55</b>	<b>Methanol</b>	<b>7.96</b>

**VOC, Particulate, and HAPs from Surface Coating Operations**

Material	Density (Lb/Gal)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Ib VOC/gal solids	Transfer Efficiency
Geomet 720 LV (A-Line)	11.4	0.95	3.20	1.30	1.23	29.51	5.39	0.00	6.10	100%
Geomet 720 LV (B-Line)	11.4	0.95	3.20	1.30	1.23	29.51	5.39	0.00	6.10	100%
Neotorquer B-2 (C-Line)	8.6	0.46	1.05	0.21	0.10	2.34	0.43	0.00	1.24	100%
Geomet 720 LV (D-Line)	11.4	0.95	3.50	1.30	1.23	29.51	5.39	0.00	6.10	100%
Geomet 720 LV (E-Line)	11.4	0.95	3.50	1.30	1.23	29.51	5.39	0.00	6.10	100%
Neotorquer (topcoater)	8.6	0.46	1.05	0.21	0.10	2.34	0.43	0.00	1.63	100%

<b>State Potential Emissions (VOCs and Particulate) (Worst Case)</b>	<b>5.11</b>	<b>122.72</b>	<b>22.40</b>	<b>0.00</b>
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Material	Density (Lb/Gal)	Gallons of Material (gal/hr)	Weight % Methanol	Methanol Emissions (ton/yr)
Geomet 720 LV (A-Line)	11.4	0.95	4.0%	1.89
Geomet 720 LV (B-Line)	11.4	0.95	4.0%	1.89
Neotorquer B-2 (C-Line)	8.6	0.46	0%	0
Geomet 720 LV (D-Line)	11.4	0.95	4.0%	1.89
Geomet 720 LV (E-Line)	11.4	0.95	4.0%	1.89
Neotorquer (topcoater)	8.6	0.46	0%	0

<b>State Potential Emissions (HAPs) (Worst Case)</b>	<b>7.55</b>
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**METHODOLOGY**

"Pounds VOC per gallon of coating less water", "Pounds VOC per gallon of coating" and "Pounds VOC per Gallon of Solids" supplied by vendor

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/hr) x (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/hr) x (8760 hr/yr) x (1 ton/2000 lbs)

Zinc and chromic acid are not atomized in the coating process

HAPS emission rate (tons/yr) = Density (lb/gal) x Gal of Material (gal/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

**Coating Emissions Summary**

Reference part: M10 x 1.25, 88 mm L

		A-Line	B-Line	C-Line	D-Line	E-Line	Original Topcoater
Coating:		Geomet 720 LV	Geomet 720 LV	Neotorquer B-2	Geomet 720 LV	Geomet 720 LV	Neotorquer B-2
Anticipated start date:		12/17/07	10/1/08	11/1/94	2/15/08	1/2/08	10/1/93
Parameter	Units						
part weight	g	62	62	62	62	62	62
weight/basket	lb	160	160	110	160	160	110
pc/basket		1,169	1,169	804	1,169	1,169	804
prdn rate	baskets/hr	17	17	20	17	17	20
pc/hr		19,873	19,873	16,080	19,873	19,873	16,080
target dry coating wt	mg/(dm) <sup>2</sup>	250	250	50	250	250	50
part surface area	dm <sup>2</sup>	0.4390	0.4390	0.4390	0.4390	0.4390	0.4390
dry coating wt/pc	mg	110	110	22	110	110	22
dry coating needed	g/hr	2,186	2,186	354	2,186	2,186	354
	lb/hr	4.8	4.8	0.8	4.8	4.8	0.8

Coating characteristics:							
Coating sp gr		1.365	1.365	1.03	1.365	1.365	1.03
Total volatiles (water & VOC)	by volume	79%	79%	83%	79%	79%	83%
VOC content	lb/gal incl water	1.3	1.3	0.21	1.3	1.3	0.21
	lb/gal less water						
VOC density	lb/gal VOC	6.69	6.69	6.69	6.69	6.69	6.69
water content	by weight	44%	44%	78%	44%	44%	78%
	lb/gal ctg	5.01	5.01	6.66	5.01	5.01	6.66
soilds density	lb/gal solids	24.2	24.2	10.0	24.2	24.2	10.0
coating solids content	lb/gal ctg	5.08	5.08	1.72	5.08	5.08	1.72
coating liquid needed assuming no density change	gal ctg/hr	0.95	0.95	0.46	0.95	0.95	0.46

VOC Emissions							
	lb VOC/hr	1.2	1.2	0.10	1.2	1.2	0.10
	lb VOC/day	30	30	2	30	30	2
	tons VOC/yr	5.4	5.4	0.4	5.4	5.4	0.4

Hazardous Air Pollutant (HAP) Emissions							
Coating used	lb ctg/hr	10.8	10.8	4.0	10.8	10.8	4.0
HAP content	% by weight	4%	4%	0%	4%	4%	0%
	lb HAP/hr	0.43	0.43	0	0.43	0.43	0
	lb HAP/day	10.3	10.3	0	10.3	10.3	0
	tons HAP/yr	1.9	1.9	0	1.9	1.9	0

**Solvent Degreasing Operations**

Material	Usage (gal/day)	Density (lb/gal)	Usage (tons/yr)	Volatile Component (%)	Potential VOC tons per year	1, 2 Epoxybutane Component (%)	PTE 1,2 Epoxybutane Component (%)	Acetonitrile Component (%)	PTE Acetonitrile
Bromopropane	5.00	11.3	10.3	100%	10.31	2%	0.21	2%	0.21

<b>Potential Emissions</b>	<b>10.31</b>	<b>0.21</b>	<b>0.21</b>
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METHODOLOGY

Usage (tons/yr) = Usage (gal/day) x Density (lb/gal) x 365 day/year x 1 ton/2000 Lb

Potential VOC tons per year = Usage (tons/yr) x Volatile Component (%)

<b>Total HAPs:</b>	<b>0.41</b>
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**Coating Ovens Combustion Emissions**

Description	Heat input capacity MMBTU/hr	Pollutant	Emission Factor lb/MMBTU	Potential Emission tons/yr
A-Line	0.794	NO <sub>x</sub>	0.1000	0.3
		SO <sub>2</sub>	0.0006	0.002
		CO	0.0840	0.29
		PM	0.0076	0.03
		VOC	0.0055	0.02
B-Line	0.794	NO <sub>x</sub>	0.1000	0.3
		SO <sub>2</sub>	0.0006	0.002
		CO	0.0840	0.29
		PM	0.0076	0.03
		VOC	0.0055	0.02
Topcoater	0.265	NO <sub>x</sub>	0.0940	0.1
		SO <sub>2</sub>	0.0006	0.001
		CO	0.0400	0.05
		PM	0.0076	0.01
		VOC	0.0055	0.01
C-Line	0.780	NO <sub>x</sub>	0.1000	0.3
		SO <sub>2</sub>	0.0006	0.002
		CO	0.0840	0.29
		PM	0.0076	0.03
		VOC	0.0055	0.02
D-Line	1.389	NO <sub>x</sub>	0.1000	0.6
		SO <sub>2</sub>	0.0006	0.004
		CO	0.0840	0.51
		PM	0.0076	0.05
		VOC	0.0055	0.03
D-Line dryer	0.397	NO <sub>x</sub>	0.1000	0.2
		SO <sub>2</sub>	0.0006	0.001
		CO	0.0840	0.15
		PM	0.0076	0.01
		VOC	0.0055	0.01
E-Line	1.389	NO <sub>x</sub>	0.1000	0.6
		SO <sub>2</sub>	0.0006	0.004
		CO	0.0840	0.51
		PM	0.0076	0.05
		VOC	0.0055	0.03

Summary	Potential tpy
NO <sub>x</sub>	2.5
SO <sub>2</sub>	0.0
CO	2.1
PM	0.2
VOC	0.1

Source - Chapter 1.4, AP-42, 5th Ed., Supplement D (7/98)

**Heat Treating Emissions Estimate**

		Emission Factor	HA-01	HA-02	HA-03	HA-04	HTA-01
			2,200	2,200	550	2,200	730
			ton/hr	ton/hr	ton/hr	ton/hr	ton/hr
Capacity	MMBtu/hr	lb/MMBtu	Tons/yr	Tons/yr	Tons/yr	Tons/yr	Tons/yr
Hardening	NO <sub>x</sub>	0.1	0.7731	0.7731	0.4520	0.7731	
	SO <sub>2</sub>	0.000588	0.0045	0.0045	0.0027	0.0045	
	CO	0.084	0.6494	0.6494	0.3797	0.6494	
	PM	0.0076	0.0588	0.0588	0.0344	0.0588	
	VOC	0.0055	0.0425	0.0425	0.0249	0.0425	
<b>Tempering</b>							
Capacity	MMBtu/hr	lb/MMBtu					
Tempering	NO <sub>x</sub>	0.1	0.5729	0.5729	0.6517	0.5729	0.1572
	SO <sub>2</sub>	0.000588	0.0034	0.0034	0.0038	0.0034	0.0009
	CO	0.084	0.4812	0.4812	0.5475	0.4812	0.1321
	PM	0.0076	0.0435	0.0435	0.0495	0.0435	0.0120
	VOC	0.0055	0.0315	0.0315	0.0358	0.0315	0.0086
<b>Smoke killer</b>							
Capacity	MMBtu/hr	lb/MMBtu					
Smoke killer	NO <sub>x</sub>	0.094	0.0844	0.0844	0.0490	0.0844	
	SO <sub>2</sub>	0.000588	0.0005	0.0005	0.0003	0.0005	
	CO	0.044	0.0395	0.0395	0.0229	0.0395	
	PM	0.0076	0.0068	0.0068	0.0040	0.0068	
	VOC	0.0055	0.0049	0.0049	0.0029	0.0049	
<b>Gas generator</b>							
Capacity	MMBtu/hr	lb/MMBtu					
Gas generator	NO <sub>x</sub>	0.1	0.2838	0.2838	0.0490	0.2838	
	SO <sub>2</sub>	0.000588	0.0017	0.0017	0.0003	0.0017	
	CO	0.084	0.2384	0.2384	0.0229	0.2384	
	PM	0.0076	0.0216	0.0216	0.0040	0.0216	
	VOC	0.0055	0.0156	0.0156	0.0029	0.0156	
<b>Air agitation PM</b>							2.27

		Potential
		t/yr
HA-01	NO <sub>x</sub>	1.15
	SO <sub>2</sub>	0.007
	CO	0.93
	PM	0.09
	VOC	0.06

HA-02	NO <sub>x</sub>	1.15
	SO <sub>2</sub>	0.007
	CO	0.93
	PM	0.09
	VOC	0.06

HA-03	NO <sub>x</sub>	1.10
	SO <sub>2</sub>	0.006
	CO	0.93
	PM	0.08
	VOC	0.06

HA-04	NO <sub>x</sub>	1.15
	SO <sub>2</sub>	0.007
	CO	0.93
	PM	0.09
	VOC	0.06

HTA-01	NO <sub>x</sub>	0.16
	SO <sub>2</sub>	0.0009
	CO	0.13
	PM	2.286
	VOC	0.009

		Potential
		t/yr
All HT	NO <sub>x</sub>	4.70
	SO <sub>2</sub>	0.03
	CO	3.85
	PM	2.63
	VOC	0.26

**Zinc Plating Emissions Estimate**

Boiler 1.5 MMBtu/hr		Potential	
		lb/hr	Tons/yr
	NOx	0.1500	0.66
	SO2	0.0009	0.004
	CO	0.1260	0.55
	PM	0.0114	0.05
	VOC	0.0083	0.04

Plating PM	1 Degr	0.02	0.0876
	2 Degr	0.04	0.1752
	Pickling	0.07	0.3066
	1 Ac EC	0.23	1.0074
	2 Ac EC	0.23	1.0074
	Alk EC	0.12	0.5256
	Plating	1.05	4.599

Chromate PM	0.0001	0.000438
HAP PM	0.00005	0.000219

Total PM	1.77	7.76
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HCl tank	0.02	0.08
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**Maximum Capacity:**

Line Speed	Loading	Total
<i>barrels/hr</i>	<i>lb/barrel</i>	<i>lb/hr</i>
30	110	3,300

	Potential		HAP PTE
	lb/hr	Tons/yr	Tons/yr
Alkaline scrubber	1.23	5.3874	
Acid scrubber	0.53	2.3214	
Chromate scrubber	0.0001	0.000438	0.000219

**Shotblasting Operations**

Unit ID	Manufacturer	Media	Model & S/N	Work Capacity	Year installed	Stack ID & diameter	Exhaust flow rate	Exhaust conditions
				(lb/hr)		(in)	(acfm)	
SBA-01	Sampoh	steel shot	T-155	1,920	1991	H	800	Ambient
			S/N 98750			(7 in)		
SBA-02	Pangborn	steel shot	6GN5R	1,920	1993	G	700	Ambient
			S/N 6GN-5R/S-930098			(6 in)		
SBA-03	Sintoblator	steel shot	CND10B	960	1997	F	350	Ambient
			S/N 4-325722			(8 in)		
SBA-04	Sampoh	sand	TA-67	480	2003	B	350	Ambient
			S/N 98372			(12 in)		
SBA-05	Pangborn	steel shot	6GN-2R36	1,920	2001	D	1,000	Ambient
			S/N 6GN-2R36/S040119			(6 in)		
SBA-06	Pangborn	steel shot	3GN-2R36	360	2005	I	700	Ambient
			S/N 3GN-2R36/S050189			(4 in)		
SBA-07	Wheelabrator	steel shot	SLB 3.0	960	2006	E	1,765	Ambient
			S/N 3311			(6 in)		
SBA-08	Pangborn	steel shot	6GN-2R	1,920	2008	C	1,000	Ambient
			S/N 6GN-2R/S040147		(not in use, 7/17/08)	(6 in)		
SBA-09	Unknown	steel shot	Unknown	300	1993	A	350	Ambient
						(6 in)	(est)	

Totals: 10,740

**326 IAC 6-2 Evaluation**

Boilers	Installation Date	Rating (MMBtu/hr)	Q (MMBtu/hr)	Pt (lb/MMBtu) (Q <10)	Applicable Rule
Boiler	1998	1.5	2.89	0.8	326 IAC 6-2-4

Q includes the 1.39 MMBtu/hr boiler that was removed from service.

[326 IAC 6-2-4]  $Pt = \frac{1.09}{Q^{0.26}}$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).  
 Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr).

**326 IAC 6-3-2 Particulate Emission Rate Limitations**

PM Control Device	Stack / Vent	Process	Process Weight, P		P ≤ 60,000 lb/hr
			each unit		E = 4.10 P <sup>0.67</sup>
			P (lb/hr)	P (ton/hr)	E (lb/hr)
packed bed scrubber	32 & 33	Plating Operations	3,300	1.65	5.73
composite mesh pad mist eliminator	31	chromate coating system	3,300	1.65	5.73
none	13 - 30	heat treating operations	7,880	3.94	10.27
dust collectors	A - I	blasting operations	10,740	5.37	12.64