



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

April 30, 2004

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

TO: Interested Parties / Applicant

RE: Ueschel Laboratories, Inc. / 127-18873-00037

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

### Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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April 30, 2004

Mr. James Keilman
Urschel Laboratories, Inc.
P.O. Box 2200
Valparaiso, IN 46384

Re: 127-18873
First Administrative Amendment to
FESOP 127-17726-00037

Dear Mr. Keilman:

Urschel Laboratories, Inc. was issued a FESOP permit on March 1, 2004 for a stationary no bake and green-sand bronze foundry operation. The FESOP application inadvertently omitted two (2) emission activities including one (1) natural gas fired dry off oven (EQ-6) rated at 0.75 MMBtu/hr and one (1) surface coating operation identified as pattern shop finishing room.

A letter requesting a permit amendment to add these activities was received on March 25, 2004. Based on the information provided by Urschel Laboratories, Inc., IDEM, OAQ has determined that the potential emissions from these units are at exemption level. The one (1) natural gas fired dry off oven qualifies as an insignificant activity with heat input equal to or less than ten million (10,000,000) Btu per hour, as defined in 326 IAC 2-7-1(21) . The one (1) surface coating operation (pattern shop finishing room) also qualifies as an insignificant activity with VOC emissions of 0.05 tons per year and no particulate emissions. These insignificant activities are not subject to any rules. Therefore, pursuant to the provisions of 326 IAC 2-7-11(a)(14), the permit is hereby administratively amended as follows (bold language has been added and language with a line through it has been removed):

Sections A.3 and D.2 of the FESOP permit are administratively amended as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
(5) One (1) natural gas fired ceramic mold furnace identified as EQ-20, and rated at maximum heat input rating of 2.52 MMBtu/hr.
(6) One (1) natural gas fired dry off oven identified as EQ-6, and rated at maximum heat input rating of 0.75 MMBtu/hr.

- (j) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):
  - (3) One (1) stainless steel foundry employing the investment casting process (electric induction melting furnace and pouring operation only), identified as Unit K, with maximum metal charge capacity of 310 pounds per hour.
  - (4) One (1) surface coating operation identified as pattern shop finishing room coating mold impressions and exhausting to S/V-5.**

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (1) Two (2) natural gas fired sand heater cooler classifiers identified as EQ-3A and EQ-3B, and each rated at maximum heat input rating of 0.375 MMBtu/hr.
  - (2) Two (2) natural gas fired ladle torches identified as EQ-12A, with combined heat input rating of 1.5 MMBtu/hr.
  - (3) One (1) natural gas fired thermal oxidizer identified PCU-3, and rated at maximum heat input rating of 0.465 MMBtu/hr.
  - (4) One (1) natural gas fired autoclave boiler identified as EQ-19, and rated at maximum heat input rating of 0.89 MMBtu/hr. [326 IAC 6-2-4]
  - (5) One (1) natural gas fired ceramic mold furnace identified as EQ-20, and rated at maximum heat input rating of 2.52 MMBtu/hr.
  - (6) One (1) natural gas fired dry off oven identified as EQ-6, and rated at maximum heat input rating of 0.75 MMBtu/hr.**

.....

- (j) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):
  - (1) Immersion Cleaning of Machine Parts identified as Unit G. [326 IAC 8-3-2&5]
  - (2) Spray booth for impeller repair.
  - (3) One (1) stainless steel foundry employing the investment casting process (melting and pouring only), identified as Unit K, with maximum metal charge capacity of 310 pounds per hour.
  - (4) One (1) surface coating operation identified as pattern shop finishing room coating mold impressions and exhausting to S/V-5.**

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

In addition, revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. Under the rule revisions the Permittee is no longer required to submit an emission statement because this source is located in Porter County and does not emit 25 tons per year or more of NOx or VOC. Therefore, Condition C.17 Emission Statement has been removed from the permit. All preceding conditions have been renumbered as well.

~~C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]~~

- ~~(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:~~

~~Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015~~

~~The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~

All other conditions of the permit shall remain unchanged and in effect. Please find attached revised FESOP permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Adeel Yousuf, at (973) 575-2555, ext. 3252 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,  
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
AY/EVP

cc: File – Porter County  
U.S. EPA, Region V  
Porter County Health Department  
Air Compliance Section Inspector Rick Massoels  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling - Michelle Boner



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# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) AND NEW SOURCE REVIEW OFFICE OF AIR QUALITY

**Urschel Laboratories Incorporated  
2503 Calumet Avenue  
Valparaiso, Indiana 46384**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F127-17726-00037	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 1, 2004  Expiration Date: March 1, 2009
First Administrative Amendment: 127-18873-00037	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Page Affected: 5, 23, and 27  Issuance Date: <b>April 30, 2004</b>



<b>SECTION A</b>	<b>SOURCE SUMMARY</b> .....	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS</b> .....	8
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Provide Information[326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.13	Emergency Provisions [326 IAC 2-8-12]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC13-14-2-2][IC13-30-3-1]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	17
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.9	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]  
[326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports  
[326 IAC 2-8-4][326 IAC 2-8-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Foundry Operations and Plasma Cutting** ..... 25

**General Construction Conditions**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.1.5 Particulate [326 IAC 6-3]
- D.1.6 Particulate Matter (PM) [326 IAC 2-2]
- D.1.7 Particulate Matter Less Than Ten Microns (PM10) [326 IAC 2-8]
- D.1.8 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-3][326 IAC 2-8]
- D.1.9 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
- D.1.11 Particulate Matter (PM)
- D.1.12 VOC and HAPs

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- D.1.13 Thermal Oxidizer Temperature
- D.1.14 Parametric Monitoring
- D.1.15 Visible Emissions Notations
- D.1.16 Parametric Monitoring
- D.1.17 Baghouse Inspections
- D.1.18 Broken or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

- D.1.19 Record Keeping Requirements
- D.1.20 Reporting Requirements

**SECTION D.2 FACILITY OPERATION CONDITIONS**

<b>Insignificant Activities</b> .....	32
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]	
D.2.2 Particulate [326 IAC 6-3-2]	
D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]	
D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]	
D.2.5 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]	
<b>Compliance Determination Requirements</b>	
<b>Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]</b>	
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>	
<b>Certification Form</b> .....	36
<b>Emergency Occurrence Form</b> .....	37
<b>Quarterly Report Form</b> .....	39
<b>Quarterly Deviation and Compliance Monitoring Report Form</b> .....	40

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

---

The Permittee owns and operates a stationary no bake and green-sand bronze foundry operations.

Authorized individual:	Plant Manager
Source Address:	2503 Calumet Avenue, Valparaiso, IN 46383
Mailing Address:	2503 Calumet Avenue, Valparaiso, IN 46383
General Source Phone:	(219) 464-4811
SIC Code:	3556
Source Location Status:	Severe nonattainment for ozone
Source Status:	Unclassified or attainment for all other criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) Green Sand Foundry operation, installed in 1990, consisting of the following:
  - (1) One (1) Sand handling system identified as Unit D, consisting of return sand storage bin, sand feeder hopper, surge hopper, batch hopper, prepared sand feeder hopper, two (2) molder hoppers and associated conveyance equipment, with maximum rate of 25 tons per day and particulate emissions controlled by a Sand Handling Baghouse PCU-1 and exhausting to S/V-1.
  - (2) Electric induction melting furnace, pouring, casting and cooling operation identified as Unit E, with maximum charge capacity of 0.3 tons of metal per hour with particulate emissions controlled by a baghouse PCU-2 and exhausting to S/V-2.
  
- (b) One (1) No Bake Foundry operation, to be installed in 2003, consisting of the following:
  - (1) One (1) Sand handling system identified as Unit A, consisting of two (2) sand silos, two (2) sand hoppers and associated conveyance equipment, with maximum rate of 5.04 tons of sand per hour, and particulate emissions controlled by a Sand Handling Baghouse PCU-1 and exhausting to S/V-1.
  - (2) Electric induction melting furnace, pouring, casting and cooling operation identified as Unit B, with maximum charge capacity of 0.6 ton of metals per hour and maximum binder usage of 26 lbs/ton of sand, with particulate emissions controlled by a baghouse PCU-2 and exhausting to S/V-2.

- (3) One (1) thermal sand reclamation operation identified as Unit C, controlling VOCs from the spent sand by a thermal oxidizer (PCU-3) with maximum system capacity of 1000 lbs sand per hour, equipped with a baghouse PCU-4 and exhausting to S/V-3.
- (c) One (1) Plasma cutting operation identified as Unit P with maximum cutting rate of 2,220 inches per hour (equivalent to process weight rate of 1.0 ton per hour) and exhausting to S/V-4.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (1) Two (2) natural gas fired sand heater cooler classifiers identified as EQ-3A and EQ-3B, and each rated at maximum heat input rating of 0.375 MMBtu/hr.
  - (2) Two (2) natural gas fired ladle torches identified as EQ-12A, with combined heat input rating of 1.5 MMBtu/hr.
  - (3) One (1) natural gas fired thermal oxidizer identified as PCU-3, and rated at maximum heat input rating of 0.465 MMBtu/hr.
  - (4) One (1) natural gas fired autoclave boiler identified as EQ-19, and rated at maximum heat input rating of 0.89 MMBtu/hr. [326 IAC 6-2-4]
  - (5) One (1) natural gas fired ceramic mold furnace identified as EQ-20, and rated at maximum heat input rating of 2.52 MMBtu/hr.
  - (6) One (1) natural gas fired dry off oven identified as EQ-6, and rated at maximum heat input rating of 0.75 MMBtu/hr.
- (b) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
  - (1) Frame and cover welding operation identified as Unit M. [326 IAC 6-3-2]
  - (2) Laser cutting operation identified as Unit O. [326 IAC 6-3-2]
  - (3) Brazing operation booth identified as Unit W. [326 IAC 6-3-2]
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved and unpaved roads and parking lots with public access.
- (g) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume.

- (h) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing, polishing, abrasive blasting; pneumatic conveying; and woodworking operations.
  - (1) Frame grinding operation identified as Unit N. [326 IAC 6-3-2]
- (i) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (j) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):
  - (1) Immersion Cleaning of Machine Parts identified as Unit G. [326 IAC 8-3-2&5]
  - (2) Spray booth for impeller repair.
  - (3) One (1) stainless steel foundry employing the investment casting process (electric induction melting furnace and pouring operation only), identified as Unit K, with maximum metal charge capacity of 310 pounds per hour.
  - (4) One (1) surface coating operation identified as pattern shop finishing room coating mold impressions and exhausting to S/V-5.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [IC 13]**

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 FESOP under 326 IAC 2-8.

### **B.2 Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]**

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

### **B.4 Enforceability [326 IAC 2-8-6]**

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 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6 Severability [326 IAC 2-8-4(4)]**

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the 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 PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and IDEM Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Telephone No.: 219-881-6712 (IDEM Northwest Regional Office)

Facsimile No.: 219-881-6745 (IDEM Northwest Regional Office)

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
  - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ , to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ , at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ , may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "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, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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 2-8 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 needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- and
- United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590
- in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.19 Permit Revision Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1]**

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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 FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
  - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
  - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-3 (Emission Offset), potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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(3)]

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "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 Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "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 the "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.10 Compliance Requirements [326 IAC 2-1.1-11]**

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

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

##### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

##### **C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

### **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

#### **C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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

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

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

## **Stratospheric Ozone Protection**

### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Green Sand Foundry operation, installed in 1990, consisting of the following:
  - (1) One (1) Sand handling system identified as Unit D, consisting of return sand storage bin, sand feeder hopper, surge hopper, batch hopper, prepared sand feeder hopper, two (2) molder hoppers and associated conveyance equipment, with maximum rate of 25 tons per day and particulate emissions controlled by a Sand Handling Baghouse PCU-1 and exhausting to S/V-1.
  - (2) Electric induction melting furnace, pouring, casting and cooling operation identified as Unit E, with maximum charge capacity of 0.3 tons of metal per hour with particulate emissions controlled by a baghouse PCU-2 and exhausting to S/V-2.
- (b) One (1) No Bake Foundry operation, to be installed in 2003, consisting of the following:
  - (1) One (1) Sand handling system identified as Unit A, consisting of two (2) sand silos, two (2) sand hoppers and associated conveyance equipment, with maximum rate of 5.04 tons of sand per hour, and particulate emissions controlled by a Sand Handling Baghouse PCU-1 and exhausting to S/V-1.
  - (2) Electric induction melting furnace, pouring, casting and cooling operation identified as Unit B, with maximum charge capacity of 0.6 ton of metals per hour and maximum binder usage of 26 lbs/ton of sand, with particulate emissions controlled by a baghouse PCU-2 and exhausting to S/V-2.
  - (3) One (1) thermal sand reclamation operation identified as Unit C, controlling VOCs from the spent sand by a thermal oxidizer (PCU-3) with maximum system capacity of 1000 lbs sand per hour, equipped with a baghouse PCU-4 and exhausting to S/V-3.
- (c) One (1) Plasma cutting operation identified as Unit P with maximum cutting rate of 2,220 inches per hour (equivalent to process weight rate of 1.0 ton per hour) and exhausting to S/V-4.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW ONLY SUBJECT ONLY TO NO BAKE FOUNDRY (UNIT A).

### Construction Conditions

#### General Construction Conditions

D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### Effective Date of the Permit

D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

D.1.4 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAQ may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of (1) one year or more.

**Operation Conditions**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

D.1.5 Particulate [326 IAC 6-3]

The particulate emissions from the emission units listed in the table below shall be limited by the following:

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 allowable emissions for each facility operating at its maximum process weight rate are as follows:

Emission Unit ID	Process Weight Rate (tons/hr)	Allowable Particulate Emissions (lb/hr)
Unit A (No Bake Foundry Sand Handling System)	5.04	12.12
Unit B (No Bake Foundry Melting/Pouring Equipment)	0.60	2.91
Unit C (No Bake Foundry: Thermal Sand Reclamation Unit)	0.50	2.57
Unit D (Green Sand Foundry Sand Handling System)	1.04	4.21
Unit E (Green Sand Foundry Melting/Pouring Equipment)	0.30	1.83
Unit P (Plasma Cutting)	1.00	4.10

D.1.6 Particulate Matter (PM) [326 IAC 2-2]

Pursuant to 326 IAC 2-2, the allowable PM emissions from:

- (a) the No Bake Foundry Sand Handling System (Unit A) shall not exceed 6.97 pounds per hour, which is equivalent to 30.53 tons per year;
- (b) the No Bake Foundry Melting/Pouring Operations (Unit B) shall not exceed 2.91 pounds per hour, which is equivalent to 12.74 tons per year;
- (c) the Thermal Sand Reclaimer (Unit C) shall not exceed 2.57 pounds per hour, which is equivalent to 11.25 tons per year;
- (d) the Green Sand Foundry Sand Handling System (Unit D) shall not exceed 4.21 pounds per hour, which is equivalent to 18.44 tons per year;
- (e) the Green Sand Foundry Metal/Pouring Operations (Unit E) shall not exceed 1.83 pounds per hour, which is equivalent to 8.01 tons per year; and

- (f) the Plasma cutting operations (Unit P) shall not exceed 4.10 pounds per hour, which is equivalent to 18.0 tons per year.

Compliance with these limits shall limit the source's potential to emit of PM to less than 250 tons per twelve (12) consecutive month period and make the requirements of 326 IAC 2-2 (PSD) not applicable.

D.1.7 Particulate Matter Less Than Ten Microns (PM10) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP) the PM-10 emissions from:

- (a) the No Bake Foundry Sand Handling System (Unit A) shall not exceed 6.97 pounds per hour, which is equivalent to 30.53 tons per year;
- (b) the No Bake Foundry Melting/Pouring Operations (Unit B) shall not exceed 2.91 pounds per hour, which is equivalent to 12.74 tons per year;
- (c) the Thermal Sand Reclaimer (Unit C) shall not exceed 2.57 pounds per hour, which is equivalent to 11.25 tons per year;
- (d) the Green Sand Foundry Sand Handling System (Unit D) shall not exceed 4.21 pounds per hour, which is equivalent to 18.44 tons per year;
- (e) the Green Sand Foundry Metal/Pouring Operations (Unit E) shall not exceed 1.83 pounds per hour, which is equivalent to 8.01 tons per year; and
- (f) the Plasma cutting operations (Unit P) shall not exceed 4.10 pounds per hour, which is equivalent to 18.0 tons per year.

Compliance with these requirements shall limit the source wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.8 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-3][326 IAC 2-8]

- (a) The total binder usage in No Bake Foundry shall be limited to 110,500 pounds per twelve (12) consecutive month period with compliance determined at the end of each month (equivalent to VOC emissions factor of 0.066 lb VOC/lb binder and 0.205 lb VOC/lb binder for emission Units A and B, respectively). This is equivalent to VOC emissions of 3.65 and 11.33 tons per year from emission Units A and B, respectively.
- (b) The VOC emissions from the Thermal Sand Reclaimer (Unit C) shall not exceed 0.06 tons per year based on control by the Thermal Oxidizer (PCU-3) with overall VOC control efficiency of 99.9%.

The binder usage limit and the controlled VOC emissions limits yield total VOC emissions from the No Bake Foundry (Sand Handling System (Unit A), Induction Furnace, Pouring, Casting & Cooling (Unit B), and Thermal Sand Reclaimer (Unit C)) that are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), 326 IAC 2-3 (Emission Offset) and 326 IAC 2-2 (Part 70) do not apply.

D.1.9 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B Preventive Maintenance Plan, of this permit, is required for the facilities (Units A, B, C, D, and E) and any emission control devices (PCU-1, PCU-2, PCU-3, and PCU-4).

## Compliance Determination Requirements

### D.1.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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- (a) During the period within 180 days after issuance of this permit, in order to demonstrate compliance with Conditions D.1.5, D.1.6 and D.1.7, the Permittee shall perform PM and PM-10 testing on the baghouse (PCU-1) controlling the particulate emissions from No Bake Foundry Sand Handling System (Unit A) and Green Sand Foundry Sand Handling System (Unit D) which exhaust through stack S/V-1, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) During the period within 180 after issuance of this permit, the Permittee shall perform VOC testing for the VOC capture system and the natural gas fired thermal oxidizer (PCU-3) utilizing sampling and analyses of the input and output sand streams for total combustible organics and discharge gas sampling for VOC utilizing Methods 25 (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner. This test shall be performed to establish the minimum duct pressure or fan amperage, and the minimum operating temperature to demonstrate compliance with the capture and control efficiencies in condition D.1.8. The overall capture and control efficiency will be determined by mass balance calculations using the test results. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

### D.1.11 Particulate Matter (PM)

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In order to comply with conditions D.1.5, D.1.6 and D.1.7, the baghouses for particulate control identified as PCU-1 shall be in operation when either of the sand handling systems for the No Bake Foundry (Unit A) or the Green Sand Foundry (Unit D) is in operation. The baghouse identified as PCU-2 shall be in operation when metal melting and pouring operations are being performed at either the No Bake Foundry (Unit B) or the Green Sand Foundry (Unit E). The baghouse identified as PCU-4 shall be in operation when the Thermal Sand Reclaimer (Unit C) is in operation.

### D.1.12 VOC and HAPs

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In order to comply with Conditions D.1.8(b), the stationary Thermal Oxidizer (PCU-3) shall be in operation and control emissions from the Thermal Sand Reclamation Operation (Unit C) at all times when the Thermal Sand Reclamation Operation (Unit C) is in operation.

## Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

### D.1.13 Thermal Oxidizer Temperature

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below 1200 °F. An hourly average temperature that is below 1200 °F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.8, as approved by IDEM.

- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

#### D.1.14 Parametric Monitoring

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in condition D.1.8, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

#### D.1.15 Visible Emissions Notations

- (a) Visible emission notations of the baghouses (PCU-1, PCU-2, and PCU-4) stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

#### D.1.16 Parametric Monitoring

The Permittee shall record the total static pressure drop across each of the baghouses identified as PCU-1, PCU-2, and PCU-4, at least once per shift when the systems are in operation. When for any one reading, the pressure drop across the baghouses (PCU-1 and PCU-2) is outside the normal range of 6.0 and 8.0 inches of water and the baghouse (PCU-4) is outside the normal range of 3.0 to 12.0 or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

#### D.1.17 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags (PCU-1, PCU-2, and PCU-4) controlling the Units A, B, C, D and E operations. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.1.18 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.19 Record Keeping Requirements

- (a) To document compliance with condition D.1.8(a), the Permittee shall maintain records of the monthly usage of the binder in No Bake Foundry. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (b) To document compliance with Condition D.1.13, the Permittee shall maintain records of the continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.
- (c) To document compliance with Condition D.1.15, the Permittee shall maintain records of visible emission notations of the baghouse PCU-1, PCU-2 and PCU-4 stack exhausts once per shift.
- (d) To document compliance with Condition D.1.16, the Permittee shall maintain per shift records of the total static pressure drop during normal operation for each baghouse.
- (e) To document compliance with Condition D.1.17, the Permittee shall maintain records of the results of the inspections required under Condition D.1.17.
- (f) To document compliance with Condition D.1.9, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (g) To document compliance with Condition D.1.14, the Permittee shall maintain records of duct pressure and fan amperage once per day.
- (h) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.20 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.8(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (1) Two (2) natural gas fired sand heater cooler classifiers identified as EQ-3A and EQ-3B, and each rated at maximum heat input rating of 0.375 MMBtu/hr.
  - (2) Two (2) natural gas fired ladle torches identified as EQ-12A, with combined heat input rating of 1.5 MMBtu/hr.
  - (3) One (1) natural gas fired thermal oxidizer identified PCU-3, and rated at maximum heat input rating of 0.465 MMBtu/hr.
  - (4) One (1) natural gas fired autoclave boiler identified as EQ-19, and rated at maximum heat input rating of 0.89 MMBtu/hr. [326 IAC 6-2-4]
  - (5) One (1) natural gas fired ceramic mold furnace identified as EQ-20, and rated at maximum heat input rating of 2.52 MMBtu/hr.
  - (6) One (1) natural gas fired dry off oven identified as EQ-6, and rated at maximum heat input rating of 0.75 MMBtu/hr.
- (b) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
  - (1) Frame and cover welding operation identified as Unit M. [326 IAC 6-3-2]
  - (2) Laser cutting operation identified as Unit O. [326 IAC 6-3-2]
  - (3) Brazing operation booth identified as Unit W. [326 IAC 6-3-2]
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved and unpaved roads and parking lots with public access.
- (g) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume.
- (h) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing, polishing, abrasive blasting; pneumatic conveying; and woodworking operations.
  - (1) Frame grinding operation identified as Unit N. [326 IAC 6-3-2]
- (i) A laboratory as defined in 326 IAC 2-7-1(21)(D).

- (j) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):
- (1) Immersion Cleaning of Machine Parts identified as Unit G. [326 IAC 8-3-2&5]
  - (2) Spray booth for impeller repair.
  - (3) One (1) stainless steel foundry employing the investment casting process (melting and pouring only), identified as Unit K, with maximum metal charge capacity of 310 pounds per hour.
  - (4) One (1) surface coating operation identified as pattern shop finishing room coating mold impressions and exhausting to S/V-5.

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

### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

#### **D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from Boiler EQ-19, shall be limited to 0.60 pounds of particulate matter per million British thermal units heat input.

#### **D.2.2 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the investment casting foundry (Unit K) shall not exceed 1.17 pounds per hour when operating at a process weight rate of 0.155 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

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

#### **D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]**

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for Immersion Cleaning Operation constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### **D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]**

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**D.2.5 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

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Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following operations:

- (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
  - (i) Frame and cover welding operation identified as Unit M.
  - (ii) Laser cutting operation identified as Unit O.
  - (iii) Brazing operation booth identified as Unit W.
  
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing, polishing, abrasive blasting; pneumatic conveying; and woodworking operations.
  - (i) Frame grinding operation identified as Unit N.

**Compliance Determination Requirements**

There are no Compliance Determination Requirements applicable to these emission units.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

There are no Compliance Monitoring Requirements applicable to these emission units.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

There are no Record Keeping and Reporting Requirements applicable to these emission units.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Urschel Laboratories Incorporated  
Source Address: 2503 Calumet Avenue, Valparaiso, IN 46383  
Mailing Address: 2503 Calumet Avenue, Valparaiso, IN 46383  
FESOP No.: F127-17726-00037

**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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Urschel Laboratories Incorporated  
Source Address: 2503 Calumet Avenue, Valparaiso, IN 46383  
Mailing Address: 2503 Calumet Avenue, Valparaiso, IN 46383  
FESOP No.: F127-17726-00037

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Urschel Laboratories Incorporated  
Source Address: 2503 Calumet Avenue, Valparaiso, IN 46383  
Mailing Address: 2503 Calumet Avenue, Valparaiso, IN 46383  
FESOP No.: F127-17726-00037  
Facility: No Bake Foundry (Unit A and Unit B)  
Parameter: Binder Usage (VOC Emissions)  
Limit: The total binder usage in No Bake Foundry shall be limited to 110,500 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC emissions of 3.65 and 11.33 tons per year from emission Units A and B, respectively.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Binder Usage This Month	Binder Usage Previous 11 Months	Binder Usage 12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Urschel Laboratories Incorporated  
 Source Address: 2503 Calumet Avenue, Valparaiso, IN 46383  
 Mailing Address: 2503 Calumet Avenue, Valparaiso, IN 46383  
 FESOP No.: F127-17726-00037

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: Urschel Laboratories Incorporated  
Address City IN Zip: 2503 Calumet Avenue, Valparaiso, Indiana 46384  
Permit No.: AA 127-18873-00037  
Reviewer: Adeel Yousuf / EVP  
Date: 04/13/04**

Heat Input Capacity  
MMBtu/hr  
0.75

Potential Throughput  
MMCF/yr  
6.6

<b>Facilities</b>	<b>MMBtu/hr</b>
One (1) natural gas fired dry off oven identified as EQ-6 and rated at 0.75 MMBtu/hr.	0.75
<b>Total</b>	<b>0.75</b>

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.01	0.02	0.00	0.33	0.02	0.28

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM Btu/hr 0.3 - < 100**

**HAPs Emissions**

**Company Name: Urschel Laboratories Incorporated  
 Address City IN Zip: 2503 Calumet Avenue, Valparaiso, Indiana 46384  
 Permit No.: AA 127-18873-00037  
 Reviewer: Adeel Yousuf / EVP  
 Date: 04/13/04**

**HAPs - Organics**

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.899E-06	3.942E-06	2.464E-04	5.913E-03	1.117E-05

**HAPs - Metals**

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.643E-06	3.614E-06	4.599E-06	1.248E-06	6.899E-06

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
No-Bake Foundry**

**Company Name: Urschel Laboratories Incorporated  
Address City IN Zip: 2503 Calumet Avenue, Valparaiso, Indiana 46384  
Permit No.: AA 127-18873-00037  
Reviewer: Adeel Yousuf / EVP  
Date: 04/13/04**

**VOC Emissions from Pattern Shop Finishing room in New No Bake Foundry**

Coating Material	Maximum Annual Consumption (gal/yr)	VOC Content (lb/gal)	Annual Emissions	
			lbs/yr	tons/yr
Sherwin Williams Lacquer Primer (Red Oxide)	3	5.71	17.13	0.0086
Sherwin Williams Lacquer Thinner Fast	3	5.49	16.47	0.0082
Freeman Repro Lam A	13	1.14	14.82	0.0074
Freeman Repro Lam B	13	0.82	10.66	0.0053
Freeman Repro Surface Coat A	3	1.17	3.51	0.0018
Freeman Repro Surface Coat B	3	0.78	2.34	0.0012
Freeman Repro A-R A-Side	13	1.27	16.51	0.0083
Freeman Repro A-R B-Side	13	1.04	13.52	0.0068
<b>Total:</b>			94.96	0.04748

Notes:

Methodology:

Emissions (ton/yr) = Maximum Throughput (gal/yr) x Emission Factor (lb VOC/gal) x 1 ton / 2000 lbs.