



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: February 28, 2005
RE: Stalcop, L.P. / 011-20760-00047
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 1/10/05



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

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Governor

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Mr. Ron St. Clair
Stalcop, L.P.
1217 West Main Street
Thorntown, Indiana 46071

February 28, 2005

Re: 011-20760-00047
First Administrative Amendment to
Part 70 No.: 011-18394-00047

Dear Mr. St. Clair:

Stalcop, L.P., located at 1217 West Main Street, Thorntown, Indiana 46071, was issued a Part 70 permit on December 29, 2004 for a stationary fabricated metal products manufacturing plant. A letter requesting the following change was received on February 14, 2005:

Request: Stalcop decided not to install the last ultrasonic vapor degreaser, which is identified as EU4 in the Part 70 permit. Please remove all references to EU4 in the Part 70 permit.

Response: The removal of ultrasonic vapor degreaser, EU4 including its applicable requirements in the Part 70 permit will constitute a "revision to descriptive information where the revision will not trigger a new applicable requirements or violate a permit term" under 326 IAC 2-7-11, administrative amendment. Therefore, the permit will be administratively amended as follows (additions are **bolded** and deletions are ~~struck-through~~ for emphasis).

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

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

- (a) One (1) open top vapor degreaser (identified as EU1), with a maximum solvent usage of 8.60 gallons of trichloroethylene per day, and exhausting to the atmosphere. This unit was constructed in 2000.
- (b) One (1) ultrasonic vapor degreaser (identified as EU2), with a maximum solvent usage of 0.20 gallons of trichloroethylene per day, and exhausting to the atmosphere. This unit was constructed in 2000.
- (c) ~~Two (2)~~ **One (1)** ultrasonic vapor degreasers, ~~(identified as EU3 and EU4), each~~ with a maximum solvent usage of 0.20 gallons of trichloroethylene per day, and exhausting to the atmosphere. EU3 was constructed in 2003 and ~~EU4 was constructed in 2004.~~

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) open top vapor degreaser (identified as EU1), with a maximum solvent usage of 8.60 gallons of trichloroethylene per day, and exhausting to the atmosphere. This unit was constructed in 2000.
- (b) One (1) ultrasonic vapor degreaser (identified as EU2), with a maximum solvent usage of 0.20 gallons of trichloroethylene per day, and exhausting to the atmosphere. This unit was constructed in 2000.
- (c) ~~Two (2)~~ **One (1)** ultrasonic vapor degreasers, (identified as EU3 and EU4), each with a maximum solvent usage of 0.20 gallons of trichloroethylene per day, and exhausting to the atmosphere. EU3 was constructed in 2003 and EU4 was constructed in 2004.

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

D.1.1 General Provisions Relating to NESHAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the open top vapor degreaser (EU1) and the ~~three (3)~~ **two (2)** Ultrasonic vapor degreasers (EU2, **and** EU3, ~~and EU4~~) described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

D.1.8 Reporting Requirements [40 CFR 63, Subpart T][326 IAC 20-6-1]

- (a) An initial notification report for the solvent cleaning machines (EU1 and EU2) was submitted on April 7, 2003 and for solvent cleaning machine (EU3) on November 20, 2003.
- (b) An initial statement of compliance for the solvent cleaning machines (EU1 and EU2) was submitted on August 1, 2003 and for solvent cleaning machine (EU3) on February 25, 2004.
- (c) ~~The Permittee shall submit an initial notification report for solvent cleaning machine (EU4) within 30 days after the issuance of this permit. The report shall include the following information:~~
 - (1) ~~The name and address of the owner or operator.~~
 - (2) ~~The address of the solvent cleaning machine.~~
 - (3) ~~A brief description of each solvent cleaning machine including machine type, solvent/air interface area, and existing controls.~~
 - (4) ~~The date of installation for the solvent cleaning machine.~~
 - (5) ~~The anticipated compliance approach for the solvent cleaning machine.~~
 - (6) ~~An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.~~
- (d) ~~The Permittee shall submit an initial statement of compliance for the solvent cleaning machine (EU4) no later than 150 days after the start up date. This statement shall include:~~

- ~~(1)~~ ~~The name and the address of the owner or operator.~~
 - ~~(2)~~ ~~The address (i.e., physical location) of the solvent cleaning machine(s).~~
 - ~~(3)~~ ~~A list of the control equipment used to achieve compliance for solvent cleaning machine.~~
 - ~~(4)~~ ~~For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.~~
- ~~(e)~~ **(c)** The Permittee shall submit an annual report by February 1 of each year following the one for which the reporting is being made. This report shall include the requirements as follows:
- (1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463(d)(10)."
 - (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- ~~(f)~~ **(d)** The Permittee shall submit an exceedance report to the commissioner semiannually. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR 63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:
- (1) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- ~~(g)~~ **(e)** Pursuant to 40 CFR 63.463 (i), the Permittee who is required to submit an exceedance report on a quarterly basis may reduce the frequency of reporting to semiannual if the following conditions are met:
- (1) The source has demonstrated a full year of compliance without an exceedance.
 - (2) The Permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T.
 - (3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.

~~(h)~~(f) The information required in (a) through ~~(i)~~ (e) above shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Request 2: The Technical Support Document (TSD) also makes several references to EU4.

Response 2: IDEM, OAQ prefers not to change the TSD because the TSD preserves the original information and integrity of the issued Part 70 permit. Therefore, no changes will be made to the TSD of the Part 70 permit.

All other conditions of the Part 70 permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File -Boone County
U.S. EPA, Region V
Boone County Health Department
Air Compliance Section Inspector – Dave Rice
Compliance Data Section
Administrative and Development



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204
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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Stalcop, L.P.
1217 West Main Street
Thorntown, Indiana 46071**

(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 2-7 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T011-18394-00047	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 29, 2004 Expiration Date: December 29, 2009
First Administrative Amendment No.: 011-20760-00047	Pages Affected: 4, 24, 30, 31
Issued by: Original signed by Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: February 28, 2005

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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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

Responsible Official:	President
Source Address:	1217 West Main Street, Thorntown, Indiana 46071
Mailing Address:	1217 West Main Street, Thorntown, Indiana 46071
General Source Phone Number:	(765) 436-7926
SIC Code:	3499
County Location:	Boone
Source Location Status:	Nonattainment for 8-hour standard for Ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules and Nonattainment NSR Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) open top vapor degreaser (identified as EU1), with a maximum solvent usage of 8.60 gallons of trichloroethylene per day, and exhausting to the atmosphere. This unit was constructed in 2000.
- (b) One (1) ultrasonic vapor degreaser (identified as EU2), with a maximum solvent usage of 0.20 gallons of trichloroethylene per day, and exhausting to the atmosphere. This unit was constructed in 2000.
- (c) One (1) ultrasonic vapor degreaser, identified as EU3 with a maximum solvent usage of 0.20 gallons of trichloroethylene per day, and exhausting to the atmosphere. EU3 was constructed in 2003.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) One (1) cleaning area consisting of the following [326 IAC 8-3-2][326 IAC 8-3-5]:
 - (1) One (1) acid copper cleaning line, designated as the "Bright Dip Line", constructed in 2000, with a maximum solvent usage rate of 0.50 gallons per hour, consisting of several dip tanks containing various cleaners and rinses;

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) open top vapor degreaser (identified as EU1), with a maximum solvent usage of 8.60 gallons of trichloroethylene per day, and exhausting to the atmosphere. This unit was constructed in 2000.
- (b) One (1) ultrasonic vapor degreaser (identified as EU2), with a maximum solvent usage of 0.20 gallons of trichloroethylene per day, and exhausting to the atmosphere. This unit was constructed in 2000.
- (c) One (1) ultrasonic vapor degreaser, identified as EU3 with a maximum solvent usage of 0.20 gallons of trichloroethylene per day, and exhausting to the atmosphere. EU3 was constructed in 2003.

(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 2-7-5(1)]

D.1.1 General Provisions Relating to NESHAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the open top vapor degreaser (EU1) and the two (2) Ultrasonic vapor degreasers (EU2 and EU3) described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

D.1.2 Halogenated Solvent Cleaning Machine NESHAP [326 IAC 20-6-1] [40 CFR Part 63, Subpart T]

These facilities are subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference in 326 IAC 20-6-1.

- (a) Pursuant to 40 CFR 63.463(a) and (b), the Permittee shall conform to the following design requirements:
 - (1) The cleaning machine shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
 - (2) The cleaning machine shall be employed with a control combination of freeboard refrigeration device and a freeboard ratio of 1.0.
 - (3) The cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
 - (4) The cleaning machine shall have a primary condenser.
- (b) Pursuant to 40 CFR 63.463(d), the following work and operational practice requirements for the degreasing operation are applicable:

- (1) Control air disturbances across the cleaning machine opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or

- (2) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
- (3) Estimates of annual solvent consumption for each solvent cleaning machine.

D.1.8 Reporting Requirements [40 CFR 63, Subpart T][326 IAC 20-6-1]

- (a) An initial notification report for the solvent cleaning machines (EU1 and EU2) was submitted on April 7, 2003 and for solvent cleaning machine (EU3) on November 20, 2003.
- (b) An initial statement of compliance for the solvent cleaning machines (EU1 and EU2) was submitted on August 1, 2003 and for solvent cleaning machine (EU3) on February 25, 2004.
- (c) The Permittee shall submit an annual report by February 1 of each year following the one for which the reporting is being made. This report shall include the requirements as follows:
 - (1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463(d)(10)."
 - (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- (d) The Permittee shall submit an exceedance report to the commissioner semiannually. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR 63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:
 - (1) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- (e) Pursuant to 40 CFR 63.463 (i), the Permittee who is required to submit an exceedance report on a quarterly basis may reduce the frequency of reporting to semiannual if the following conditions are met:
 - (1) The source has demonstrated a full year of compliance without an exceedance.

- (2) The Permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T.
- (3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.
- (f) The information required in (a) through (e) above shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590