INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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*Commissioner*

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

TO: Interested Parties / Applicant

DATE: August 4, 2005

RE: Manchester Metals, LLC / 169-21321-00019

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

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 1/10/05

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August 5, 2005

Mr. David L. Boyd
Manchester Metals, LLC
P.O. Box 345
North Manchester, IN 46962

Re: **169-21321-00019**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 169-9014-00019**

Dear Mr. Boyd:

Manchester Metals, LLC was issued Part 70 Operating Permit **T 169-9014-00019** on May 14, 2002 for a gray iron and steel foundry. An application to modify the source was received on May 20, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission unit will be approved to use the catalyst Triethylamine at the source:

(f) One (1) core and mold preparation process consisting of the following emission units and pollution control devices:

(5) Two (2) isocure processes, constructed in 1980, identified as part of CM, with catalyst emissions controlled by a fume scrubber, exhausting through stack S8, capacity: 2.0 tons of sand per hour, 80 pounds of isocure per hour, and 20 pounds of catalyst (Dimethylethylamine) or 40 pounds of Triethylamine per hour, total.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval 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.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of

this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This minor source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

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 contact Craig J. Friederich, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 631-691-3395, ext. 19 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

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

Attachments
CJF/MES
cc: File - WabashCounty
Wabash County Health Department
Air Compliance Section Inspector – Dick Sekula
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner

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# PART 70 OPERATING PERMIT
# OFFICE OF AIR QUALITY

## Manchester Metals, LLC
## 205 Wabash Road
## North Manchester, Indiana 46962

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

This permit is issued 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.

| | |
|---|---|
| First Minor Source Modification No.:<br>169-21321-00019 | Sections Affected: A.2, B.24, D.4 and Quarterly Report forms |
| Issued by:<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: |

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 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 gray iron and steel foundry source.

| | |
|---|---|
| Responsible Official: | David L. Boyd |
| Source Address: | 205 Wabash Road, North Manchester, Indiana 46962 |
| Mailing Address: | P.O. Box 345, North Manchester, Indiana 46962 |
| General Source Phone Number: | (260) 982-2191 |
| SIC Code: | 3321 |
| County Location: | Wabash |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Major Source, under PSD Rules;<br>Minor Source, Section 112 of the Clean Air Act<br>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) scrap handling process, constructed in 1968, including one (1) bridge crane and one (1) scale, identified as process SI, not exhausting through a stack, maximum rated capacity: 10 tons of metal per hour.

(b) One (1) melting and casting process consisting of the following emission units and pollution control devices:

(1) One (1) 1.16 million British thermal unit per hour natural gas-fired scrap charge pre-heater, constructed in 1970, identified as CP, exhausting inside the building, some emissions controlled by the general ventilation baghouse DC1, and exiting through the general building exhaust and at stack S1.

(2) Three (3) electric induction (scrap iron) furnaces, constructed in 1973 and modified in 1995, identified as IF1, IF2, and IF3, exhausting inside the building, some emissions controlled by the general ventilation baghouse DC1, and exiting through the general building exhaust and at stack S1, maximum charge rate: 3.6 tons per hour, each.

(3) One (1) electric induction (stainless steel) furnace, constructed in 1966, identified as IF4, maximum charge rate: 1.0 ton per hour.

(4) Four (4) natural gas-fired ladle heaters, constructed in 1970, identified as LH1, LH2, LH3, and LH4, combined maximum capacity: 2.6 million British thermal units per hour, total.

(5) One (1) molding, pouring and cooling line, identified as the disamatic molding/

pouring line, part of operation MP, constructed in 1993, with no controls on emissions and the emissions are exhausted via the production building general ventilation, capacity: 30 tons of molding sand and 5 tons of metal per hour.

(6) One (1) molding, pouring and cooling line, identified as the disaforma molding/ pouring line, part of operation MP, constructed in 1986, with no controls on emissions and the emissions are exhausted via the production building general ventilation, capacity: 60 tons of molding sand and 10 tons of metal per hour.

(7) One (1) molding, pouring and cooling line, identified as the pallet line and floor stations, part of operation MP, constructed prior to 1973, with no controls on emissions and the emissions are exhausted via the production building general ventilation, capacity: 6 tons of molding sand and 1 ton of metal per hour.

(c) One (1) shakeout operation, constructed in 1973, identified as operation CCS, with PM and $PM_{10}$ emissions controlled by baghouse DC2 and exhausting through stack S2, maximum capacity: 80 tons of sand and 10 tons of metal per hour.

(d) One (1) cleaning and finishing process consisting of the following emission units and pollution control devices:

(1) One (1) casting cleaner shotblaster, constructed in 1968, identified as CCL1, with PM and $PM_{10}$ emissions controlled by baghouse DC4 and exhausting through stack S4, maximum capacity: 1.0 ton of castings per hour.

(2) One (1) casting cleaner shotblaster, constructed in 1968, identified as CCL2, with PM and $PM_{10}$ emissions controlled by baghouse DC6 and exhausting through stack R5, maximum capacity: 3.0 tons of castings per hour.

(3) One (1) shot blast cleaner, constructed in 1974, identified as CCL3, with PM and $PM_{10}$ emissions controlled by baghouse DC7 and exhausting through stack S10, maximum capacity: 2.5 tons of castings per hour.

(4) Seven (7) pedestal wheel grinders, with six (6) constructed in 1993 and one (1) constructed in 1994, identified as GR1, GR2, GR5, GR6, GR7, GR8, and GR9, with PM and $PM_{10}$ emissions from all of the grinders controlled by baghouse DC6 and exhausting through stack R5, maximum throughput: 0.25 ton of castings per hour, each.

(5) Two (2) dual wheel grinders, constructed in 1993, identified as GR3 and GR4, with PM and $PM_{10}$ emissions from both grinders controlled by baghouse DC6 and exhausting through stack R5, maximum throughput: 0.5 ton of castings per hour, each.

(6) One (1) 3.2 million British thermal unit per hour natural gas-fired annealing oven, constructed in 1967, identified as HT1, exhausting through stack S9, maximum capacity: 1.5 tons of iron per hour.

(e) One (1) sand handling process consisting of the following emission units and pollution control devices:

(1) One (1) muller, constructed in 1987, identified as SH, with PM and $PM_{10}$ emissions controlled by baghouse DC3 and exhausting through stack S6 or S6R, maximum capacity: 100 tons of sand per hour.

(2) One (1) mold sand handling system, constructed in 1965, identified as SH, with PM and $PM_{10}$ emissions controlled by baghouse DC3 and exhausting through stack S6, maximum capacity: 100 tons of sand per hour.

(3) One (1) core sand handling system, constructed in 1970, identified as SH, exhausting through stack I3 with some particulate exhausting through small filters, capacity: 50 tons of sand per hour.

(f) One (1) core and mold preparation process consisting of the following emission units and pollution control devices:

(1) Two (2) mold making lines, identified as DM1, one constructed in 1986 with a capacity of 60 tons of sand per hour and one constructed in 1993 with a capacity of 30 tons of sand per hour. Only sand, clay and water are used in the mold making operation.

(2) One (1) pallet molding operation, constructed in 1965, capacity: 5 tons of sand per hour. Only sand, clay and water are used in the mold making operation.

(3) Seven (7) shell core making machines, constructed in 1981, identified as part of CM, capacity: 2.0 tons of pre-mixed sand per hour, total.

(4) One (1) air set core machine, constructed in 1997, identified as part of CM, capacity: 1.5 tons of sand, 3.91 pounds of alphaset and 1.30 pounds of alphacure per hour.

(5) Two (2) isocure processes, constructed in 1980, identified as part of CM, with catalyst emissions controlled by a fume scrubber, exhausting through stack S8, capacity: 2.0 tons of sand per hour, 80 pounds of isocure per hour, and 20 pounds of catalyst (Dimethylethylamine) or 40 pounds of Triethylamine per hour, total.

(6) One (1) 0.5 million British thermal unit per hour (MMBtu/hr) natural gas-fired core baking oven, constructed in 1970, identified as part of CM, exhausting through two (2) stacks, identified as S7A and S7B.

(g) Inoculation operations, operating since approximately 1973, exhausting inside the building, with some emissions controlled by the general ventilation baghouse DC1, and exiting through the general building exhaust and at stack S1, capacity: 10 tons of metal per hour.

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) Degreasing operations that do not exceed 145 gallons per 12 month period, except if subject to 326 IAC 20-6, including one (1) parts washer, constructed in 1987, equipped with a lid. There are no halogenated solvents used in the degreasing operations. [326 IAC 8-3-2]

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]

(c) Any of the following structural steel activities, constructed in 1980:

(1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent. [326 IAC 6-3]

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(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) Except as provided in 326 IAC 2-7-19(e), 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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

(e) One (1) sand handling process consisting of the following emission units and pollution control devices:

(1) One (1) muller, constructed in 1987, identified as SH, with PM and $PM_{10}$ emissions controlled by baghouse DC3 and exhausting through stack S6 or S6R, maximum capacity: 100 tons of sand per hour.

(2) One (1) mold sand handling system, constructed in 1965, identified as SH, with PM and $PM_{10}$ emissions controlled by baghouse DC3 and exhausting through stack S6, maximum capacity: 100 tons of sand per hour.

(3) One (1) core sand handling system, constructed in 1970, identified as SH, exhausting through stack I3 with some particulate exhausting through small filters, capacity: 50 tons of sand per hour.

(f) One (1) core and mold preparation process consisting of the following emission units and pollution control devices:

(1) Two (2) mold making lines, identified as DM1, one constructed in 1986 with a capacity of 60 tons of sand per hour and one constructed in 1993 with a capacity of 30 tons of sand per hour. Only sand, clay and water are used in the mold making operation.

(2) One (1) pallet molding operation, constructed in 1965, capacity: 5 tons of sand per hour. Only sand, clay and water are used in the mold making operation.

(3) Seven (7) shell core making machines, constructed in 1981, identified as part of CM, capacity: 2.0 tons of pre-mixed sand per hour, total.

(4) One (1) air set core machine, constructed in 1997, identified as part of CM, capacity: 1.5 tons of sand, 3.91 pounds of alphaset and 1.30 pounds of alphacure per hour.

(5) Two (2) isocure processes, constructed in 1980, identified as part of CM, with catalyst emissions controlled by a fume scrubber, exhausting through stack S8, capacity: 2.0 tons of sand per hour, 80 pounds of isocure per hour, and 20 pounds of catalyst (Dimethyl-ethylamine) or 40 pounds of Triethylamine per hour, total.

(6) One (1) 0.5 million British thermal unit per hour (MMBtu/hr) natural gas-fired core baking oven, constructed in 1970, identified as part of CM, exhausting through two (2) stacks, identified as S7A and S7B.

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

(a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the one (1) muller (part of SH) and mold sand handling, exhausting to baghouse DC3, shall not

exceed 51.3 pounds per hour, total, when operating at a process weight rate of 100 tons of sand per hour.

(b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the core sand handling operations (part of SH) shall not exceed 44.6 pounds per hour, when operating at a process weight rate of 50 tons of sand per hour.

The pounds per hour limitations were calculated with the following equation:

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

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Any change or modification that increases the potential to emit VOC from any of the seven (7) shell core making machines to 25 tons per year or more, shall cause that facility to become subject to the requirements of 326 IAC 8-1-6, and shall require prior IDEM, OAQ approval.

(b) Any change or modification that increases the potential to emit VOC from the one (1) airset core machine to 25 tons per year or more, shall cause that facility to become subject to the requirements of 326 IAC 8-1-6, and shall require prior IDEM, OAQ approval.

(c) Any change or modification that increases the potential to emit VOC from either of the two (2) mold making lines or the pallet molding line to 25 tons per year or more, shall cause that facility to become subject to the requirements of 326 IAC 8-1-6, and shall require prior IDEM, OAQ approval.

(d) In order to render the requirements of 326 IAC 8-1-6 (New facilities; General reduction requirements) not applicable, the following conditions shall apply to the two (2) isocure processes, constructed in 1980:

(1) The resin usage for each isocure process shall not exceed 5,713 pounds of resin per twelve (12) consecutive month period. DMEA and Triethylamine usage for each isocure process shall not exceed 49,514 pounds of DMEA or Triethylamine per twelve (12) consecutive month period.

(2) The VOC emissions (not including DMEA or Triethylamine) from each of the isocure processes shall not exceed 0.05 pound per pound of resin.

(3) The DMEA and Triethylamine emissions from each of the isocure processes shall not exceed 260 pounds per ton of cores.

Therefore, the requirements of 326 IAC 8-1-6 (New facilities; General reduction requirements) shall not apply.

D.4.3 PSD Minor Modification Limit [326 IAC 2-2] [40 CFR 52.21]

(a) In order to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the following conditions shall apply to the two (2) isocure processes, constructed in 1980:

(1) The resin usage for the total of the two (2) isocure process shall not exceed 9,155 pounds of resin per twelve (12) consecutive month period. DMEA and Triethylamine

usage for the total of the two (2) isocure process shall not exceed 79,342 pounds of DMEA and Triethylamine per twelve (12) consecutive month period.

(2) The VOC emissions (not including DMEA or Triethylamine) from the isocure processes shall not exceed 0.05 pound per pound of resin.

(3) The DMEA and Triethylamine emissions from the isocure processes shall not exceed 260 pounds per ton of cores.

Therefore, the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) shall not apply.

(b) Any change or modification that increases the potential to emit VOC from the seven (7) shell core making machines, constructed in 1981, to 40 tons per year or more shall cause the seven (7) shell core making machines to become subject to 326 IAC 2-2, PSD, and shall require prior IDEM, OAQ, approval.

(c) Any change or modification that increases the potential to emit VOC from the one (1) mold making line, constructed in 1986, to 40 tons per year or more shall cause the one (1) mold making line to become subject to 326 IAC 2-2, PSD, and shall require prior IDEM, OAQ, approval.

(d) Any change or modification that increases the potential to emit VOC from the one (1) air set core machine, constructed in 1997, to 40 tons per year or more shall cause the one (1) air set core machine to become subject to 326 IAC 2-2, PSD, and shall require prior IDEM, OAQ, approval.

(e) Any change or modification that increases the potential to emit VOC from either of the two (2) mold making lines or the pallet molding line to 40 tons per year or more shall cause the line to become subject to 326 IAC 2-2, PSD, and shall require prior IDEM, OAQ, approval.

(f) The outlet grain loading at the baghouse (DC3), controlling the one (1) muller and one (1) mold sand handling system, shall not exceed 0.015 grains per dry standard cubic foot and the flow rate shall not exceed 26,000 actual cubic feet per minute. This will limit the potential to emit PM from baghouse DC3 to less than 5.71 pounds per hour and the potential to emit $PM_{10}$ to less than 3.42 pounds per hour. Therefore, the potential to emit PM is limited to less than 25 tons per year and the potential to emit $PM_{10}$ is limited to less than 15 tons per year from the addition of the one (1) muller, and the modification is a minor modification to an existing major source.

D.4.4 HAPs Limit [326 IAC 2-7-10.5(d)]

In order for the addition of the Triethylamine catalyst to qualify as a minor modification to the Part 70 Operating Permit, pursuant to 326 IAC 2-7-10.5(d)(4)(A), the total usage of Triethylamine to the two (2) isocure processes shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.4.5 Nonapplicable Conditions

(a) Operation Condition D.4.2 from F 169-6298-00019, issued on June 25, 1997, which states that pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from the facilities and operations of the sand handling process shall be limited to 2.03 pounds per hour, is not applicable because the limit in the FESOP was truncated so that the total of all hourly emission limits, when operating 8,760 hours per year, would result in a potential to emit PM and $PM_{10}$ less than 100 tons per year. Since this source is a major source pursuant to 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, the truncated hourly limits are not applicable.

The facilities will be required to comply with the hourly PM emission limit in Condition D.1.4. Therefore, Condition D.4.2 of F 169-6298-00019, is hereby rescinded.

(b) Operation Condition D.4.3 from F 169-6298-00019, issued on June 25, 1997, which states that the $PM_{10}$ emissions from the muller, identified as SH, and the mold sand handling system, identified as SH, both controlled by baghouse DC-3, shall be limited to 4.12 pounds per hour, is not applicable because the $PM_{10}$ limit in the FESOP existed so that the total of all hourly emission limits, when operating 8,760 hours per year, would result in a potential to emit $PM_{10}$ less than 100 tons per year. Since this source is a major source pursuant to 326 IAC 2-7, Part 70, this $PM_{10}$ emission limitation is not required. Therefore, Condition D.4.3 of F 169-6298-00019 is hereby rescinded.

(c) Operation Condition D.5.2 from F 169-6298-00019, issued on June 25, 1997, which states that the particulate matter (PM) emissions from the facilities and operations of the core and mold preparation process listed in Condition A.2(e) shall be limited to 1.13 pounds per hour, is not applicable because the PM limit in the FESOP was truncated so that the total of all hourly emission limits, when operating 8,760 hours per year, would result in a potential to emit PM and $PM_{10}$ less than 100 tons per year. Since this source is a major source pursuant to 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, the truncated hourly limits are not applicable. The core and mold sand handling operations will be required to comply with the hourly PM emission limit in Condition D.4.1. Therefore, Condition D.5.2 of F 169-6298-00019 is hereby rescinded.

D.4.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the muller, mold sand handling, and core sand handling and their control devices and the two (2) isocure processes.

**Compliance Determination Requirements**

D.4.7 Particulate Matter (PM and $PM_{10}$)

(a) In order to demonstrate compliance with Condition D.4.1 and D.4.3, the baghouse (DC3) shall be in operation at all times and control emissions from the muller and mold sand handling at all times when the muller and/or mold sand handling is in operation.

(b) In order to demonstrate compliance with Condition D.4.1, the small dust collectors shall be in operation at all times and control emissions from the core sand handling operations at all times when the core sand handling is in operation.

D.4.8 VOC Emissions

Compliance with Conditions D.4.3(a) and D.4.2(d) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.4.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Condition D.4.3, the Permittee shall perform PM and $PM_{10}$ testing to verify that the muller is in compliance with Condition D.4.3(f), utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing. 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 condensible $PM_{10}$.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.4.10 Visible Emissions Notations

(a) Visible emission notations of the muller and mold sand handling baghouse stack exhaust (DC3) and small filters controlling the core sand handling shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.4.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse (DC3) used in conjunction with the muller and mold sand handling, at least once per shift when the shakeout process is in operation when venting to the atmosphere. When, for any one (1) reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 7.0 inches of water 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 violation of 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.4.12 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the muller and mold sand handling, when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.13 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. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). 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 violation of this permit.

(b) For single compartment baghouses, 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 Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.4.14 Record Keeping Requirements

(a) To document compliance with Conditions D.4.3(a), D.4.2(d), and D.4.4, the Permittee shall maintain records of the catalyst and resin usage for each month.

(b) To document compliance with Conditions D.4.3(a) and D.4.2(d), the Permittee shall maintain records of the VOC content of binders used at each of the isocure processes each month.

(c) To document compliance with Condition D.4.10, the Permittee shall maintain records of visible emission notations of the muller and mold sand handling baghouse (DC3) stack and the small filters controlling the core sand handling exhausts once per shift.

(d) To document compliance with Condition D.4.11, the Permittee shall maintain the following:

(1) Records of the inlet and outlet differential static pressure for the baghouses during normal operation when venting to the atmosphere once per shift.

(2) Documentation of the dates vents are redirected.

(e) To document compliance with Condition D.4.12, the Permittee shall maintain records of the results of the inspections required under Condition D.4.12 and the dates the vents are redirected.

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

D.4.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.3(a), D.4.2(d), and D.4.4 shall be submitted to the address 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 reports submitted by the Permittee do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
## COMPLIANCE DATA SECTION
## Part 70 Quarterly Report

Source Name: Manchester Metals, LLC
Source Address: 205 Wabash Road, North Manchester, Indiana 46962
Mailing Address: P.O. Box 345, North Manchester, Indiana 46962
Part 70 Permit No.: T 169-9014-00019
Facility: Two (2) isocure processes
Parameter: DMEA or Triethylamine Usage
Limit: No more than 49,514 pounds per twelve (12) consecutive month period, and no more than 79,342 pounds per twelve (12) consecutive month period, total

YEAR:

| Month | DMEA and Triethyl-amine Usage at process 1 (lbs) | DMEA and Triethyl-amine Usage at process 2 (lbs) | Total DMEA and Triethyl-amine Usage (lbs) | DMEA and Triethyl-amine Usage at process 1 (lbs) | DMEA and Triethyl-amine Usage at process 2 (lbs) | Total DMEA and Triethyl-amine Usage (lbs) | DMEA and Triethyl-amine Usage at process 1 (lbs) | DMEA and Triethyl-amine Usage at process 2 (lbs) | Total DMEA and Triethyl-amine Usage (lbs) |
|---|---|---|---|---|---|---|---|---|---|
| | This Month | | | Previous 11 Months | | | 12 Month Total | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.

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
### Part 70 Quarterly Report

Source Name: Manchester Metals, LLC
Source Address: 205 Wabash Road, North Manchester, Indiana 46962
Mailing Address: P.O. Box 345, North Manchester, Indiana 46962
Part 70 Permit No.: T 169-9014-00019
Facility: Two (2) isocure processes
Parameter: Triethylamine Usage
Limit: Less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

| Month | Triethyl-amine Usage at process 1 (lbs) | Triethyl-amine Usage at process 2 (lbs) | Total Triethyl-amine Usage (lbs) | Triethyl-amine Usage at process 1 (lbs) | Triethyl-amine Usage at process 2 (lbs) | Total Triethyl-amine Usage (lbs) | Triethyl-amine Usage at process 1 (lbs) | Triethyl-amine Usage at process 2 (lbs) | Total Triethyl-amine Usage (lbs) |
|---|---|---|---|---|---|---|---|---|---|
| | This Month | | | Previous 11 Months | | | 12 Month Total | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by:

Title/Position:

Signature:

Date:

Phone:

Attach a signed certification to complete this report.