



*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: January 4, 2006  
RE: Rightway Fasteners / 005-21625-00048  
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 permit modification 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) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



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**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW (ENSR)  
OFFICE OF AIR QUALITY**

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

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

This permit is issued 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 and 326 IAC 2-1-3.2 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.: T005-7301-00048	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 18, 1999  Expiration Date: March 18, 2004

First Reopening No. R-005-13153-00048, issued December 31, 2001

First Minor Permit Modification No.: 005-21625-00048	Affected pages: 5, 26-28, 30-31, 36, 42
Issued by:Original Signed By: Nisha Sizemore, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 4, 2006

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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)]

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

Responsible Official: Dennis E. Gray  
Source Address: 7945 South International Drive, Columbus, Indiana 47201  
Mailing Address: 7945 South International Drive, Columbus, Indiana 47201  
SIC Code: 3452, 3479  
County Location: Bartholomew  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) Sonicor model LDR-09 vapor degreaser for fasteners (ID B-Line), with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel parts per hour.
- (b) One (1) degreasing tank, designated as #1, with a capacity of 354 gallons.
- (c) One (1) degreasing tank, designated as #2, with a capacity of 712 gallons.
- (d) One (1) electrocleaning tank which has a capacity of 354 gallons.
- (e) One (1) automated alkaline zinc electroplating line with a maximum capacity of 4,100 gallons.  
  
Facilities in items (b) through (e) are controlled by one (1) packed bed scrubber with an air flow rate of 24,000 cubic feet per minute (cfm), venting to stack P-S-1.
- (f) Two (2) pickling tanks designated as #1 and #2, each has a capacity of 317 gallons.
- (g) One (1) electrocleaning tank, which has a capacity of 357 gallons. Facilities in items (f) and (g) are controlled by one (1) packed bed scrubber with an air flow rate of 15,500 cfm, venting to stack P-S-2.
- (h) One (1) automated chromate coating system, which has a capacity 129 gallons. The zinc chromate mists from this facility is controlled by one (1) composite mesh pad mist eliminator with an air flow rate of 6,000 cubic feet per minute (cfm), venting to stack P-C-1.
- (i) One (1) acid storage tank, with a capacity of 6,500 gallons.
- (j) One (1) glass bead blasting machine, capable of using 1,016 pounds of glass bead media 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)]

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

(a) 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.

(b) Other activities or categories not previously identified:  
Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only.

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day    Particulate Matter (PM) = 5 lbs/hr or 25 lbs/day  
Sulfur Dioxide (SO<sub>2</sub>) = 5 lbs/hr or 25 lbs/day    Carbon monoxide (CO) = 25 lbs/day  
Nitrogen Oxides (NO<sub>x</sub>) = 5 lbs/hr or 25 lbs/day    Volatile Organic Compounds (VOC) = 3 lbs/hr or 15 lbs/day

(1) Metal Surface coating with waterborne materials.

(c) One (1) natural gas-fired boiler, with a heat input of 1.5 MMBtu/hr, venting to stack P-B-1.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

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- (a) 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 Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### B.2 Definitions [326 IAC 2-7-1]

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

### B.3 Permit Term [326 IAC 2-7-5(2)]

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

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

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

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

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (b) 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.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 certification 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 July 1 of each year to:

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

and

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

- (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 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision;
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) 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;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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  
Indianapolis, Indiana 46204-2251

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (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 2-7-16.
- (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 describe 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 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) for sources subject to this rule after the effective date of this rule. 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 2-7-4-(c)(9) 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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)]
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

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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 2-7-4. 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).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (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. [326 IAC 2-5-3]
  - (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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
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 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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  
Indianapolis, Indiana 46204-2251  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (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.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

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(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 2-1 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  
Indianapolis, Indiana 46204-2251

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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, 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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, 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.  
[326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ nor an authorized representative, may disclose the information unless and until IDEM, OAQ makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAQ acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]**

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Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAQ shall reserve the right to issue a new permit.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

**B.27 Enhanced New Source Review [326 IAC 2]**

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The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

**B.28 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]**

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter 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.

**C.2 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six 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.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

**C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

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 units vented to the control equipment are in operation.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

- (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  
Indianapolis, Indiana 46204-2251

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **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 that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

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

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods 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  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the

source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

#### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit or by a later date specified by an applicable requirement or upon Part 70 permit issuance if required by either an existing applicable requirement or a previous IDEM, OAQ approval. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee shall notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

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

The notification 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.11 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

#### **C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAQ that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
  - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that 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 or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6][326 IAC 2-7-19 (e)]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
- (1) Indicate actual emissions of criteria pollutants from the source;
  - (2) Indicate actual emissions of other regulated pollutants from the source.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (c) The annual 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.

#### **C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ representative, 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (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 Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (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, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 2-7-5(15)]

- (a) One (1) Sonicator model LDR-09 vapor degreaser for fasteners (ID B-Line), with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel parts per hour.

(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 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]

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

- (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;
- (c) Minimize solvent carry-out by:
  - (1) Racking parts to allow complete drainage;
  - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
  - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
  - (4) Tipping out any pools of solvent on the cleaned parts before removal;
  - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

**D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.3 Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with Condition D.1.1.
- (1) The VOC and HAP content of the degreaser used.
  - (2) The amount of VOC used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The volume weighted VOC and HAP content of the degreaser used for each day.
  - (4) The total VOC and HAP usage for each day.
- (b) These records shall be maintained in accordance with Section C - General Record Keeping supplies.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

#### Insignificant Activity:

- (a) 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.

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grinding and machining operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

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

### Compliance Determination Requirements

#### D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

#### D.2.3 Particulate Matter (PM)

The fabric filters, scrubbers, mist collectors, wet collectors and/or electrostatic precipitators used to control particulate matter shall be in operation at all times when the grinding and machining processes are in operation.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

There are no Record Keeping and Reporting requirements applicable to this facility.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

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

#### Insignificant Activity:

- (b) Other activities or categories not previously identified:  
Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only.  
Lead (Pb) = 0.6 ton/year or 3.29 lbs/day  
Sulfur Dioxide (SO<sub>2</sub>) = 5 lbs/hr or 25 lbs/day  
Nitrogen Oxides (NO<sub>x</sub>) = 5 lbs/hr or 25 lbs/day  
Particulate Matter (PM) = 5 lbs/hr or 25 lbs/day  
Carbon monoxide (CO) = 25 lbs/day  
Volatile Organic Compounds (VOC) = 3 lbs/hr or 15 lbs/day
- (1) Metal Surface coating with waterborne materials.

(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.3.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) the input VOC from each coating line and the usage of cleanup solvent for the coating line (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited to less than fifteen (15) pounds per day. This limitation will make the requirements of 326 IAC 8-2-9 not applicable.

### Compliance Determination Requirements

#### D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

There are no Compliance Monitoring requirements applicable to this facility.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.3.3 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;

- (3) The cleanup solvent usage for each day;
  - (4) The total VOC usage for each day; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.4 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.3.1 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.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description 326 IAC 2-7-5(15)

- (b) One (1) degreasing tank, designated as #1, with a capacity of 354 gallons.
- (c) One (1) degreasing tank, designated as #2, with a capacity of 712 gallons.
- (d) One (1) electrocleaning tank which has a capacity of 354 gallons.
- (e) One (1) automated alkaline zinc electroplating line with a maximum capacity of 4,100 gallons.  
  
Facilities in items (b) through (e) are controlled by one (1) packed bed scrubber with an air flow rate of 24,000 cubic feet per minute (cfm), venting to stack P-S-1.
- (f) Two (2) pickling tanks designated as #1 and #2, each has a capacity of 317 gallons.
- (g) One (1) electrocleaning tank, which has a capacity of 357 gallons. Facilities in items (f) and (g) are controlled by one (1) packed bed scrubber with an air flow rate of 15,500 cfm, venting to stack P-S-2.
- (h) One (1) automated chromate coating system, which has a capacity 129 gallons. The zinc chromate mists from this facility is controlled by one (1) composite mesh pad mist eliminator with an air flow rate of 6,000 cubic feet per minute (cfm), venting to stack P-C-1.
- (i) One (1) acid storage tank, with a capacity of 6,500 gallons.
- (j) One (1) glass bead blasting machine, capable of using 1,016 pounds of glass bead media per hour.

(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(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the electroplating line, chromate coating system and glass bead blasting machine shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

#### D.4.2 Volatile Organic Compound (VOC) [326 IAC 8-3]

Any change in the degreasing solvent usage into a solvent containing VOC shall require approval by the Office of Air Quality (OAQ) before such change may occur.

### Compliance Determination Requirements

#### D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

### **D.4.4 Particulate Matter**

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Pursuant to 326 IAC 6-3-2(c), the one (1) packed bed scrubber for PM control shall be in operation at all times when the electroplating line and chromate coating system are in operation.

## SECTION D.5

## FACILITY OPERATION CONDITIONS

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

#### Insignificant Activity:

- (c) One (1) natural gas-fired boiler, with a heat input of 1.5 MMBtu/hr, venting to stack P-B-1.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the one (1) natural gas fired boiler shall be limited to 0.6 pounds per MMBtu heat input. This limitation is used because the calculated limitation was greater than 0.60 pounds per million Btu.

The calculated limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q= Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

### Compliance Determination Requirements

#### D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

#### D.5.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Rightway Fasteners, Inc.  
Source Address: 7945 South International Drive, Columbus, Indiana 47201  
Mailing Address: 7945 South International Drive, Columbus, Indiana 47201  
Part 70 Permit No.: T005-7301-00048

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- 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 DATA SECTION  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Rightway Fasteners, Inc.  
Source Address: 7945 South International Drive, Columbus, Indiana 47201  
Mailing Address: 7945 South International Drive, Columbus, Indiana 47201  
Part 70 Permit No.: T005-7301-00048

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<input checked="" type="radio"/> 1.	This is an emergency as defined in 326 IAC 2-7-1(12) C The 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 C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/> 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    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/deviation:
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: \_\_\_\_\_

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

## Part 70 Quarterly Report

Source Name: Rightway Fasteners, Inc.  
Source Address: 7945 South International Drive, Columbus, Indiana 47201  
Mailing Address: 7945 South International Drive, Columbus, Indiana 47201  
Part 70 Permit No.: T005-7301-00048  
Facility: Metal Surface Coatings  
Parameter: VOC  
Limit: Less than 15 pounds per day for each line

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day	B-Line	Day	B-Line
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

No deviation occurred in this month.

Deviation/s occurred in this month.  
Deviation has been reported on:

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

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

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Rightway Fasteners, Inc.  
Source Address: 7945 South International Drive, Columbus, Indiana 47201  
Mailing Address: 7945 South International Drive, Columbus, Indiana 47201  
Part 70 Permit No.: T005-7301-00048

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed by: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a  
Part 70 Minor Source Modification and Part 70 Minor Permit Modification**

**Source Background and Description**

Source Name:	Rightway Fasteners, Inc.
Source Location:	7945 S. International Drive, Columbus, Indiana 47201
County:	Bartholomew
SIC Code:	3452, 3479
Operation Permit No.:	T005-7301-00048
Operation Permit Issuance Date:	March 18, 1999
Minor Source Modification No.:	005-21382-00048
Minor Permit Modification No.:	005-21625-00048
Permit Reviewer:	ERG/TDP

The Office of Air Quality (OAQ) has reviewed an application from Rightway Fasteners, Inc. relating to the construction of the following emission units and pollution control devices:

- (a) One (1) Sonikor model LDR-09 vapor degreaser for fasteners (ID B-Line), with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel parts per hour.

**History**

On July 6, 2005, Rightway Fasteners, Inc. submitted an application to the OAQ requesting to replace the current B-line vapor degreaser with a new, smaller degreaser. There are no stacks associated with this construction. Additionally, the source provided information on July 26, 2005 that the A-line and C-line vapor degreasers were previously removed in 2001. Rightway Fasteners, Inc. was issued a Part 70 permit on March 18, 1999. A Part 70 renewal permit is currently pending.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on July 16, 2005.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (page 1).

**Potential To Emit of Modification**

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

This table reflects the net emissions increase of the modification – See Appendix A for the respective emission calculations.

Pollutant	Potential To Emit (tons/year)
PM	--
PM-10	--
SO <sub>2</sub>	--
VOC	10.3
CO	--
NO <sub>x</sub>	--

  

HAP's	Potential To Emit (tons/year)
Acetonitrile	0.21
1,2, - Epoxybutane	0.21
Total	0.42

**Justification for Modification**

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. Pursuant to 326 IAC 2-7-10.5(d)(3) as the potential to emit VOC from this modification is greater than ten (10) tons per year but less than twenty five (25) tons per year. The Part 70 Operating permit is being modified through a Minor Permit Modification pursuant to 326 IAC 2-7-12(b)

**County Attainment Status**

The source is located in Bartholomew County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>x</sub>	Attainment
1-hr and 8-hr Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Bartholomew County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Bartholomew County

has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability section.

- (c) Bartholomew County has been classified as attainment or unclassifiable for CO, PM10, SO2, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability section
- (d) Fugitive Emissions  
 Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Source Status**

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM10	less than 100
SO <sub>2</sub>	less than 100
VOC	less than 100
CO	less than 100
NOx	less than 100

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document for T005-7301-00048.

**Potential to Emit of Modification After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Sonicor model LDR-09 vapor degreaser	--	--	--	10.3	--	--	0.41
Total	--	--	--	10.3	--	--	0.41

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The Sonicor model LDR-09 vapor degreaser is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, because the vapor degreaser does not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than five percent (5%) by weight.

### **State Rule Applicability – Individual Facilities**

#### **326 IAC 8-3-3 (Open Top Vapor Degreaser Operation)**

The new Sonicor model LDR-90 vapor degreaser is subject to 326 IAC 8-3-3 (Open Top Vapor Degreaser Operation) because the open top vapor degreaser was constructed after January 1, 1980.

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

- (a) equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing workloads through the degreaser;
- (c) minimize solvent carry-out by:
  - (1) Racking parts to allow complete drainage;
  - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
  - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
  - (4) Tipping out any pools of solvent on the cleaned parts before removal;
  - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) not occupy more than half of the degreaser's open top area with the workload;
- (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) never spray above the vapor level;
- (h) repair solvent leaks immediately, or shut down the degreaser;
- (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) not use workplace fans near the degreaser opening;
- (k) not allow visually detectable water in the solvent exiting the water separator; and

- (l) provide a permanent, conspicuous label summarizing the operating requirements.

#### 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements)

The new B-line vapor degreaser is not subject to 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements), because the degreaser has an air to solvent interface of less than one (1) square meter (ten and eight-tenths (10.8) square feet).

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

### Proposed Changes

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

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

- ~~(a) One (1) Tanabe Kakoki Co. conveyORIZED in-line dichloromethane degreaser (ID A-Line) for disc brake rotors, installed in 1991, with a daily solvent consumption of 55 gallons per day, exhausting at two (2) stacks, identified as AD1 and AD2.~~
- ~~(b) One (1) Tanabe Kakoki Co. in-line conveyORIZED dichloromethane degreaser (ID B-Line) for fasteners, installed in 1991, with a daily solvent consumption of 20 gallons per day, exhausting at two (2) stacks, identified as BD1 and BD2.~~
- ~~(c) One (1) Trinity Industrial Corp. in-line conveyORIZED dichloromethane degreaser (ID C-Line) for general parts, installed in 1993, with a daily solvent consumption of 13 gallons per day, exhausting at one (1) stack, identified as CD1.~~
- (a) One (1) Sonicor model LDR-09 vapor degreaser for fasteners (ID B-Line), with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel parts per hour.**
- (4b) One (1) degreasing tank, designated as #1, with a capacity of 354 gallons.**
- (5c) One (1) degreasing tank, designated as #2, with a capacity of 712 gallons.**
- (6d) One (1) electrocleaning tank which has a capacity of 354 gallons.**
- (7e) One (1) automated alkaline zinc electroplating line with a maximum capacity of 4,100 gallons.**

Facilities in items (4b) through (7e) are controlled by one (1) packed bed scrubber with an air flow rate of 24,000 cubic feet per minute (cfm), venting to stack P-S-1.

- (8f) Two (2) pickling tanks designated as #1 and #2, each has a capacity of 317 gallons.
- (9g) One (1) electrocleaning tank, which has a capacity of 357 gallons. Facilities in items (8f) and (9g) are controlled by one (1) packed bed scrubber with an air flow rate of 15,500 cfm, venting to stack P-S-2.
- (10h) One (1) automated chromate coating system, which has a capacity 129 gallons. The zinc chromate mists from this facility is controlled by one (1) composite mesh pad mist eliminator with an air flow rate of 6,000 cubic feet per minute (cfm), venting to stack P-C-1.
- (14i) One (1) acid storage tank, with a capacity of 6,500 gallons.
- (12j) One (1) glass bead blasting machine, capable of using 1,016 pounds of glass bead media per hour.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (a) ~~One (1) Tanabe Kakoki Co. conveyorized in-line dichloromethane degreaser (ID A-Line) for disc brake rotors, installed in 1991, with a daily solvent consumption of 55 gallons per day, exhausting at two (2) stacks, identified as AD1 and AD2.~~
- (b) ~~One (1) Tanabe Kakoki Co. in-line conveyorized dichloromethane degreaser (ID B-Line) for fasteners, installed in 1991, with a daily solvent consumption of 20 gallons per day, exhausting at two (2) stacks, identified as BD1 and BD2.~~
- (c) ~~One (1) Trinity Industrial Corp. in-line conveyorized dichloromethane degreaser (ID C-Line) for general parts, installed in 1993, with a daily solvent consumption of 13 gallons per day, exhausting at one (1) stack, identified as CD1.~~
- (a) **One Sonicator model LDR-09 vapor degreaser for fasteners (ID B-Line), with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel parts per hour.**

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

### ~~D.1.3 Degreaser Operation and Control [326 IAC 8-3]~~

~~Any change in the degreasing solvent usage into a solvent containing VOC shall require approval by the Office of Air Quality (OAQ) before such change may occur.~~

### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]

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

- (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;
- (c) Minimize solvent carry-out by:

- (1) Racking parts to allow complete drainage;**
  - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;**
  - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;**
  - (4) Tipping out any pools of solvent on the cleaned parts before removal;**
  - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;**
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;**
  - (e) Not occupy more than half of the degreaser's open top area with the workload;**
  - (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;**
  - (g) Never spray above the vapor level;**
  - (h) Repair solvent leaks immediately, or shut down the degreaser;**
  - (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;**
  - (j) Not use workplace fans near the degreaser opening;**
  - (k) Not allow visually detectable water in the solvent exiting the water separator; and**
  - (l) Provide a permanent, conspicuous label summarizing the operating requirements.**

**D.1.7 Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

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...

- (i) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with Condition D.1.1.**
  - (1) The VOC and HAP content of the degreaser used.**
  - (2) The amount of VOC used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
  - (3) The volume weighted VOC and HAP content of the degreaser used for each day.**
  - (4) The total VOC and HAP usage for each day.**
- (j) These records shall be maintained in accordance with Section C - General Record Keeping supplies.**

**SECTION D.4 FACILITY OPERATION CONDITIONS**

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

- (4b) One (1) degreasing tank, designated as #1, with a capacity of 354 gallons.
- (5c) One (1) degreasing tank, designated as #2, with a capacity of 712 gallons.
- (6d) One (1) electrocleaning tank which has a capacity of 354 gallons.
- (7e) One (1) automated alkaline zinc electroplating line with a maximum capacity of 4,100 gallons. Facilities in items (4b) through (7e) are controlled by one (1) packed bed scrubber with an air flow rate of 24,000 cubic feet per minute (cfm), venting to stack P-S-1.
- (8f) Two (2) pickling tanks designated as #1 and #2, each has a capacity of 317 gallons.
- (9g) One (1) electrocleaning tank, which has a capacity of 357 gallons. Facilities in items (8f) and (9g) are controlled by one (1) packed bed scrubber with an air flow rate of 15,500 cfm, venting to stack P-S-2.
- (10h) One (1) automated chromate coating system, which has a capacity 129 gallons. The zinc chromate mists from this facility is controlled by one (1) composite mesh pad mist eliminator with an air flow rate of 6,000 cubic feet per minute (cfm), venting to stack P-C-1.
- (11i) One (1) acid storage tank, with a capacity of 6,500 gallons.
- (12j) One (1) glass bead blasting machine, capable of using 1,016 pounds of glass bead media per hour.

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

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

### Part 70 Quarterly Report

Source Name: Rightway Fasteners, Inc.  
 Source Address: 7945 South International Drive, Columbus, Indiana 47201  
 Mailing Address: 7945 South International Drive, Columbus, Indiana 47201  
 Part 70 Permit No.: T005-7301-00048  
 Facility: Metal Surface Coatings  
 Parameter: VOC  
 Limit: Less than 15 pounds per day for each line

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day	Line-A	B-Line B	Line-C	Day	Line-A	B-Line B	Line-C
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

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

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

Upon further review, IDEM, OAQ has decided to make the following revision to the permit (bolded language has been added, the language with a line through it has been deleted).

1. The mailing address for IDEM, OAQ has been changed throughout the permit.

Indiana Department of Environmental Management  
100 North Senate Avenue, ~~P.O. Box 6015~~  
Indianapolis, Indiana ~~46206-6015~~ **46204**

2. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into your permit as follows:

**B.28 Credible Evidence [~~326 IAC 2-7-5(3)~~][~~326 IAC 2-7-6~~][62 FR 8314] [~~326 IAC 1-1-6~~]**

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

**Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 005-21382-00048 and Part 70 Minor Permit Modification No. 005-21625-00048.

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

**Addendum to the Technical Support Document  
for Minor Permit Modification to a Part 70 Operating Permit**

**Source Background and Description**

Source Name:	Rightway Fasteners, Inc.
Source Location:	7945 S. International Drive, Columbus, Indiana 47201
County:	Bartholomew
SIC Code:	3452, 3479
Operation Permit No.:	T005-7301-00048
Operation Permit Issuance Date:	March 18, 1999
Minor Permit Modification No.:	005-21625-00048
Permit Reviewer:	ERG/TDP

On September 28, 2005, the Office of Air Quality (OAQ) had a notice published in the The Republic of Columbus, Indiana, stating that Rightway Fasteners, Inc. had applied for a Minor Permit Modification to a Part 70 Operating Permit to operate a stationary metal products and fasteners manufacturing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified, if applicable, to reflect these changes.

1. All degreasers subject to Subpart T have been removed from this facility. Therefore, conditions pertaining to the NESHAP in Section D.1 have been removed.

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

~~The provisions of 40 CFR 63 Subpart A—General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart T.~~

~~D.1.2 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]~~

~~This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) that was promulgated on December 2, 1994. The source shall come into compliance with this rule no later than December 2, 1997.~~

The following design requirements for each degreasing operation are applicable:

- ~~(a) A reduced room draft as described in '63.463 (e)(2)(ii).~~
- ~~(b) Each solvent cleaning machine shall have a freeboard ratio of 0.75 or greater.~~

- ~~(c) — Each solvent 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.~~
- ~~(d) — Each solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.~~
- ~~(e) — Each solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.~~
- ~~(f) — Each solvent cleaning machine shall have a primary condenser.~~
- ~~(g) — Each owner or operator of an in-line cleaning machine shall demonstrate that their solvent cleaning machine can achieve and maintain an idling emission limit of 0.10 kilograms per hour per square meter (0.021 pounds per hour per square foot) of solvent /air interface area as determined using the procedures in '63.465(a) and appendix A to this part.~~
- ~~(h) — A combination of controls, including a dwell and a freeboard refrigeration device shall be used.~~
- ~~(i) — Monitoring shall be conducted of each control device used.~~

~~The following operational practices for each degreasing operation are applicable:~~

- ~~(a) — A reduced room draft as described in '63.463 (e)(2)(ii).~~
- ~~(b) — Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.~~
- ~~(c) — Parts shall be oriented so that the solvent drains from them freely. Parts with holes may need to be tipped or rotated before being removed.~~
- ~~(d) — Parts baskets or parts shall not be removed from any solvent cleaning machine before dripping has stopped.~~
- ~~(e) — During startup of each solvent cleaning machine, the primary condenser shall be turned on before the sump heater.~~
- ~~(f) — During shutdown of each solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.~~
- ~~(g) — When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.~~
- ~~(h) — Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or by EPA approved alternative methods.~~
- ~~(i) — Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of Subpart T, if requested during an inspection.~~

~~(j) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers that may contain a pressure relief device.~~

~~(k) Sponges, fabric, wood, and paper products shall not be cleaned.~~

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~~D.1.31 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]~~

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~~D.1.42 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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~~D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

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~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limit specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

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

---

~~D.1.6 Monitoring Requirements~~

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~~The Permittee shall determine whether each control device used to comply with 40 CFR 63, Subpart T meets the following requirements:~~

~~(a) Conduct monitoring of each control device used to comply with ' 63.463 of 40 CFR Part 63, Subpart T as provided in ' 63.466.~~

~~(b) If a freeboard refrigeration device is used to comply with the 40 CFR Part 63, Subpart T standards, ensure weekly that the chilled air blanket temperature measured at the center of the air blanket of the freeboard refrigeration device is no greater than thirty percent (30%) of the solvent's boiling point. A thermometer or thermocouple shall be used to measure the temperature at the center of the air blanket during the idling mode.~~

~~(c) Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time, as measured using the procedures in ' 63.466(d).~~

~~(i) The Permittee shall conduct initial and quarterly monitoring of wind speed within six (6) inches above the top of the freeboard area of the solvent cleaning machine as follows:~~

~~(A) Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located;~~

~~(B) Orient a velometer in the direction of the wind current at each of the four corners of the machine;~~

~~(C) Record the reading for each corner;~~

~~(D) Average the values obtained at each corner and record the average wind speed.~~

~~(d) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in ' 63.466(d).~~

- ~~(i) Monitor initially and weekly, the room parameters established during the initial compliance test that are used to achieve the reduced room draft.~~
- ~~(e) If a working-mode cover is used to comply with the 40 CFR Part 63, Subpart T standards, the owner or operator shall:
  - ~~(i) Ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.~~
  - ~~(ii) Ensure that the working-mode cover is maintained free of cracks, holes, and other defects.~~
  - ~~(iii) The owner or operator shall conduct monitoring on the above control equipment, on a monthly basis, by visually inspection to determine if the cover is opening and closing properly, completely covers the solvent cleaning machine openings when closed, and is free of cracks, holes, and other defects.~~~~
- ~~(f) If a dwell is used to comply with the 40 CFR Part 63, Subpart T standards, the owner or operator shall:
  - ~~(i) Determine the appropriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket, as described in '63.465(d).~~
  - ~~(ii) Ensure that, after cleaning, such part is held in the solvent cleaning machine freeboard area above the vapor zone for the dwell time determined for that particular part or parts basket, or for the maximum dwell time determined using the most complex part type or parts basket.~~
  - ~~(iii) The owner or operator shall conduct monitoring on the above control equipment, on a monthly basis, by determining the actual dwell time by measuring the period of time that the parts are held within the freeboard area of the solvent cleaning machine after cleaning.~~~~
- ~~(g) The owner or operator of each in-line solvent cleaning machine complying with the equipment or idling standards in '63.463 shall monitor the hoist speed as follows:
  - ~~(i) Determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).~~
  - ~~(ii) Monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly.~~
  - ~~(iii) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.~~
  - ~~(iv) If an owner or operator can demonstrate to EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.~~~~

- ~~(h) — If any of the requirements of the above (d), (e), or (f) are not met, the Permittee shall determine whether an exceedance has occurred.~~
- ~~(i) — An exceedance has occurred if (d), (e), or (f) has not been met; or~~
- ~~(ii) — An exceedance has occurred if (b), (c), or (e) has not been met and is not corrected within fifteen (15) days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.~~
- ~~(iii) — If an exceedance occurs, the owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in ' 63.468 (h).~~
- ~~(i) — Each owner or operator of an in-line cleaning machine complying with the idling emission limit shall:~~
  - ~~(i) — Conduct an initial performance test to demonstrate compliance with the applicable idling emission limit and establish parameters that will be monitored to demonstrate compliance for the above (b), (c), (d), (e), and (f).~~
  - ~~(ii) — Conduct the periodic monitoring of the parameters used to demonstrate compliance as described in ' 63.466 (f).~~
  - ~~(iii) — Operate the solvent cleaning machine within parameters identified in the initial performance test.~~
  - ~~(iv) — If any of the requirements of the above (i), (ii), or (iii) are not met, the Permittee shall determine whether an exceedance has occurred.~~
    - ~~(A) — If using one of the above controls (b), (c), (d), (e), and (f), the owner or operator shall comply with the appropriate parameter values listed in the above controls (b), (c), (d), (e), and (f) and the exceedance delineations listed in the above (h).~~
    - ~~(B) — If using a control not listed above in (b), (c), (d), (e), and (f), the owner or operator shall indicate whether the exceedance of the parameters that are monitored to determine the proper functioning of this control would be classified as an immediate exceedance or whether a 15-day repair period would be allowed. This information must be submitted to the Administrator for approval.~~
    - ~~(C) — The owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in ' 63.468 (h).~~

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.1.73 Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~The Permittee shall maintain records to document compliance with Conditions D.1.1 and D.1.6. These records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. These records shall include a minimum of the following:~~

~~The following records shall be kept for the life of the degreaser:~~

- ~~(a) — Owner=s manuals or written maintenance and operating procedures, for the solvent cleaning machine and control equipment.~~
- ~~(b) — The date of installation of the solvent cleaning machine and all of its control devices.~~
- ~~(c) — If a dwell is used to comply with these standards, records of the tests required in ' 63.465 (d) to determine an appropriate dwell time for each part or parts basket.~~
- ~~(d) — For each solvent cleaning machine complying with the idling emission limit standards, records shall be maintained of the initial performance test, including the idling emission rate and values of the monitoring parameters measured during the test.~~
- ~~(e) — Records of the halogenated HAP solvent content for each solvent used in the solvent cleaning machine.~~

~~The following records shall be kept for a period of five (5) years:~~

- ~~(f) — Results of the monitoring requirements under ' 63.466.~~
- ~~(g) — Information or actions taken to comply with the design requirements for the degreasing operation, including 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.~~
- ~~(h) — Estimates of annual solvent consumption of the solvent cleaning machine.~~

~~Records maintained for (e) and (h) of this condition shall be taken monthly and shall be complete and sufficient to establish compliance with the NESHAP (Subpart T).~~

~~(a)~~ (a) To document compliance with Condition D.1.31, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with Condition D.1.1.

- (1) The VOC and HAP content of the degreaser used.
- (2) The amount of VOC used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (3) The volume weighted VOC and HAP content of the degreaser used for each day.
  - (4) The total VOC and HAP usage for each day.
- (b) These records shall be maintained in accordance with Section C - General Record Keeping supplies.

~~D.1.8 Reporting Requirements~~

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~~A summary of the information to document compliance with Conditions D.1.1 and D.1.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:~~

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204~~

and

~~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~~

- ~~(a) Submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include:
  - ~~(i) 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 ' 63.463(d)(10).~~
  - ~~(ii) An estimate of the solvent consumption for each solvent cleaning machine during the reporting period.~~~~
- ~~(b) Submit a semiannual exceedance report. Once an exceedance has occurred, the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency has been approved as under ' 63.468(i). Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The report shall include:
  - ~~(i) Information on the actions taken to comply with monitoring conditions, including 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.~~
  - ~~(ii) The reason for any exceedance that has occurred and description of the actions taken.~~
  - ~~(iii) 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.~~~~

2. The address for IDEM, OAQ has changed throughout the permit as follows:

Indiana Department of Environmental Management  
Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-**2251**

**Appendix A: Emissions Calculations**

**VOC Emissions**

**Degreasing Operations**

**Company Name:** Rightway Fasteners, Inc.  
**Address:** 7945 S. International Dr., Columbus, Indiana 47201  
**Title V:** 005-7301-00048  
**MPM:** 005-21625-00048  
**Reviewer:** ERG/TDP  
**Date:** July 21, 2005

Material	Usage (gal/day)	Density (lb/gal)	Usage (tons/yr)	Volatile Component (%)	Potential VOC tons per year	1, 2 Epoxybutane Component (%)	PTE 1,2 Epoxybutane Component (%)	Acetonitrile Component (%)	PTE Acetonitrile
Bromopropane	5.00	11.3	10.3	100%	10.3	2.00%	0.21	2.00%	0.21
<b>State Potential Emissions</b>					<b>10.3</b>		<b>0.21</b>		<b>0.21</b>

METHODOLOGY

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

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

**Total HAPs: 0.41**