



*Mitchell E. Daniels, Jr.*  
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Commissioner

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TO: Interested Parties / Applicant  
DATE: December 17, 2007  
RE: Indiana Automotive Fastener, Inc./ 059-21946-00024  
FROM: Matthew Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot12/03/07



Mitchell E. Daniels, Jr.  
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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT OFFICE OF AIR QUALITY

**Indiana Automotive Fastener, Inc.  
1300 West Anderson Boulevard  
Greenfield, Indiana 46140**

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

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F059-21946-00024	
Issued by/Original Signed By:  Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 17, 2007  Expiration Date: December 17, 2012

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>4</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS .....</b>	<b>6</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.17 Permit Renewal [326 IAC 2-8-3(h)]	
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20 Source Modification Requirement [326 IAC 2-8-11.1]	
B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS.....</b>	<b>16</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Stack Height [326 IAC 1-7]	
C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.9 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.10 Compliance Requirements [326 IAC 2-1.1-11]	

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

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

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

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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

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

**Stratospheric Ozone Protection**

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

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23**

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

- D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]
- D.1.2 Particulate [326 IAC 6-3-2]
- D.1.3 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]
- D.1.4 Volatile Organic Compounds (VOCs) Limitations [326 IAC 8-2-9]
- D.1.5 Volatile Organic Compounds (VOCs) Limitations
- D.1.6 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

**Compliance Determination Requirements**

- D.1.7 Particulate Matter Control (PM)

**Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

- D.1.8 Visible Emissions Notations
- D.1.9 Parametric Monitoring
- D.1.10 Broken or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

- D.1.11 Record Keeping Requirements
- D.1.12 Reporting Requirements

Certification Form .....	27
Emergency Occurrence Form .....	28
FESOP Monthly Report.....	30
Quarterly Deviation and Compliance Monitoring Report Form .....	31

## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary facility manufacturing nuts and bolts for the automotive industry.

Source Address:	1300 West Anderson Boulevard, Greenfield, IN 46140
Mailing Address:	1300 West Anderson Boulevard, Greenfield, IN 46140
General Source Phone Number:	317-467-0100
SIC Code:	3452
County Location:	Hancock
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Two (2) SBL shot blasters (DC1), identified as EU-8a and EU-8b, constructed in 1996, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
- (b) Two (2) SBL shot blasters (DC2), identified as EU-20a, and EU-20b, constructed in 1996, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;

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

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

- (a) Fifty-seven (57) head forming machines and two (2) nut forming machines, identified as EU-6, constructed between 1996 and 2007, each processing a maximum of 12,000 fasteners per hour, each controlled by a Smog Hog Electrostatic Precipitator, twenty-nine of the head forming machines exhausting to stacks V6:1-9 and the remaining machines exhausting within the building; [326 IAC 2-8-4]
- (b) Two (2) natural gas fired boilers, identified as EU-15, and EU-15-1, constructed in 1996, each rated at 2.1 MMBtu/hr, and exhausting to stacks V15 and V15-1; [326 IAC 6-2-4]
- (c) One (1) natural gas fired boiler, identified as EU-16, rated at 1.2 MMBtu/hr, constructed in 1996, and exhausting to stack V16; [326 IAC 6-2-4]

- (d) One (1) dip coating operation and natural gas fired dry-off oven (DC2), identified as EU-22, rated at 0.7 MMBtu/hr, processing a maximum of 248,000 fasteners per hour and exhausting to stacks V22-A and V22-B; [326 IAC 8-2-9]
- (e) One (1) natural gas fired dacrotizing ovens (DC1), identified as EU-9, constructed in 1996, rated at 0.7 MMBtu/hr, processing a maximum of 80,000 fasteners per hour and exhausting to stacks V9 and V9-1 respectively [326 IAC 8-2-9]

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

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

## SECTION B GENERAL CONDITIONS

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

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

### B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, F059-21946-00024, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

### B.5 Severability [326 IAC 2-8-4(4)]

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

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

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

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]**

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(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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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 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that 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: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
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 2-8-4(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F059-21946-00024 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency 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 Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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  
MC 61-53 IGCN 1003  
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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make 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 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

C.7 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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.

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

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

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

**C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.19 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 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Two (2) SBL shot blasters (DC1), identified as EU-8a and EU-8b, constructed in 1996, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
- (b) Two (2) SBL shot blasters (DC2), identified as EU-20a, and EU-20b, constructed in 1996, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;

### Insignificant Activities:

- (a) Fifty-seven (57) head forming machines and two (2) nut forming machines, identified as EU-6, constructed between 1996 and 2007, each processing a maximum of 12,000 fasteners per hour, each controlled by a Smog Hog Electrostatic Precipitator, twenty-nine of the head forming machines exhausting to stacks V6:1-9 and the remaining machines exhausting within the building; [326 IAC 2-8-4]
- (b) Two (2) natural gas fired boilers, identified as EU-15, and EU-15-1, constructed in 1996, each rated at 2.1 MMBtu/hr, and exhausting to stacks V15 and V15-1; [326 IAC 6-2-4]
- (c) One (1) natural gas fired boiler, identified as EU-16, rated at 1.2 MMBtu/hr, constructed in 1996, and exhausting to stack V16; [326 IAC 6-2-4]
- (d) One (1) dip coating operation and natural gas fired dry-off oven (DC2), identified as EU-22, rated at 0.7 MMBtu/hr, processing a maximum of 248,000 fasteners per hour and exhausting to stacks V22-A and V22-B; [326 IAC 8-2-9]
- (e) One (1) natural gas fired dacrotizing ovens (DC1), identified as EU-9, constructed in 1996, rated at 0.7 MMBtu/hr, processing a maximum of 80,000 fasteners per hour and exhausting to stacks V9 and V9-1 respectively [326 IAC 8-2-9]

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

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

#### D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [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 three (3) natural gas-fired boilers (EU-15, EU-15-1 and EU-16), rated at 2.1, 2.1 and 1.2 MMBtu/hr, respectively, shall not exceed 0.6 pounds per MMBtu heat input.

#### D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from shot blasters EU-8a, EU-8b, EU-20a and EU-20b shall not exceed 2.17 pounds per hour each when they are operating at a process weight rate of 773, 773, 775 and 775 pounds per hour, respectively. The pound per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.3 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]

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Pursuant to 326 IAC 2-8-4 (FESOP), PM-10 emissions from:

- (a) The four (4) shot blasters (EU-8a, EU-8b, EU-20a and EU-20b) shall be limited to 2.17 pounds per hour, each, including both filterable and condensable fractions; and
- (b) The fifty seven (57) head forming machines and two (2) nut forming machines (EU-6) shall be limited to 0.244 pounds per hour, each, including both filterable and condensable fractions.

Compliance with these limits combined with potential PM10 emissions from other emission units shall limit PM10 emissions to less than 100 tons and render the Part 70 rules (326 IAC 2-7) not applicable.

#### D.1.4 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

---

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5), excluding water from emission units EU-22 and EU-9, as delivered to the applicator.

#### D.1.5 Volatile Organic Compounds (VOC) Limitations

---

The zinc plating/chromate treatment dip process identified as EU-12 and EU-26 shall be limited such that the actual VOC emissions from each emission unit will be less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 will not apply to emission units EU-12 and EU-26.

#### D.1.6 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

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Pursuant to 326 IAC 8-2-9(f), when using solvents for clean-up at emission units EU-22 and EU-9, all solvents sprayed from the emission units EU-22 and EU-9 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

### Compliance Determination Requirements

#### D.1.7 Particulate Control

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- (a) In order to comply with Conditions D.1.2 and D.1.3, the baghouse for particulate control shall be in operation and control emissions from the abrasive blasting process at all times the abrasive blasting process is in operation. The electrostatic precipitators for particulate control shall be in operation and control emissions from the head forming machines at all times the head forming machines are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

## **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

### **D.1.8 Visible Emissions Notations**

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- (a) Visible emissions notations of the abrasive blasting stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

### **D.1.9 Parametric Monitoring**

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The Permittee shall record the pressure drop across the baghouse used in conjunction with the abrasive blasting process, at least once per day when the abrasive blasting process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

### **D.1.10 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

## **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

### **D.1.11 Record Keeping Requirements**

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- (a) To document compliance with conditions D.1.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.1.4.
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on monthly basis:
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (3) The total VOC usage for each month.
- (b) To document compliance with conditions D.1.5, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.1.5.
  - (1) The total VOC usage for each day; and
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain a daily record of visible emission notations of the abrasive blasting stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the abrasive blasting process. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.12 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

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

Source Name: Indiana Automotive Fastener, Inc.  
Source Address: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Mailing Address: 1300 West Anderson Boulevard, Greenfield, IN 46140  
FESOP Permit No.: F059-21946-00024

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

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

Source Name: Indiana Automotive Fastener, Inc.  
Source Address: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Mailing Address: 1300 West Anderson Boulevard, Greenfield, IN 46140  
FESOP Permit No.: F059-21946-00024

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|---|

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

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

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

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

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

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

A certification is not required for this report.

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

**FESOP Monthly Report**

Source Name: Indiana Automotive Fastener, Inc.  
Source Address: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Mailing Address: 1300 West Anderson Boulevard, Greenfield, IN 46140  
FESOP Permit No.: F059-21946-00024  
Facility: Emission Units EU-12 and EU-26  
Parameter: VOC Emissions  
Limit: Less than 15 lbs per day

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

Day		Day	
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 deviation occurred in this month.

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Indiana Automotive Fastener, Inc.  
Source Address: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Mailing Address: 1300 West Anderson Boulevard, Greenfield, IN 46140  
FESOP Permit No.: F059-21946-00024

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

Page 1 of 2

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

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

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

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

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

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

Attach a signed certification to complete this report.

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

Addendum to the Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP)

**Source Background and Description**

<b>Source Name:</b>	<b>Indiana Automotive Fasteners, Inc.</b>
<b>Source Location:</b>	<b>1300 West Anderson Boulevard, Greenfield, IN 46140</b>
<b>County:</b>	<b>Hancock</b>
<b>SIC Code:</b>	<b>3452</b>
<b>Operation Permit No.:</b>	<b>F059-21946-00024</b>
<b>Permit Reviewer:</b>	<b>Ganesh Srinivasan/EVP</b>

On November 2, 2007, the Office of Air Quality (OAQ) had a notice published in the Daily Reporter, Greenfield, Indiana, stating that Indiana Automotive Fasteners, Inc. had applied for a FESOP Permit F059-21946-00024. 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.

On November 30, 2007, Indiana Automotive Fasteners, Inc. submitted comments on the proposed FESOP permit. The summary of the comment and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

**Comment 1:**

The dip coating operation, EU-22, is listed as a specifically regulated insignificant activity in Condition A.3(e). This process is identical to EU-9, which is listed in the insignificant activities in the TSD. These units should both be listed in Section A.3.

**Response 1:**

Emission unit EU-9 will be subject to the requirements of 326 IAC 8-2-9. Therefore, emission unit EU-9 was added to Conditions A.3 and D.1.4 as shown below:

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

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

\*\*\*\*

- (e) **One (1) natural gas fired dacrotizing ovens (DC1), identified as EU-9, constructed in 1996, rated at 0.7 MMBtu/hr, processing a maximum of 80,000 fasteners per hour and exhausting to stacks V9 and V9-1 respectively [326 IAC 8-2-9]**

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

\*\*\*\*

**Insignificant Activities:**

\*\*\*\*

**(e) One (1) natural gas fired dacrotizing ovens (DC1), identified as EU-9, constructed in 1996, rated at 0.7 MMBtu/hr, processing a maximum of 80,000 fasteners per hour and exhausting to stacks V9 and V9-1 respectively [326 IAC 8-2-9]**

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

**D.1.4 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]**

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Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5), excluding water from emission units **EU-22 and EU-9**, as delivered to the applicator.

**Comment 2:**

Condition D.1.5 should be removed. EU-12 is not a specifically regulated insignificant activity according to Section A.3. This will also remove condition D.1.11(b) referring to recordkeeping requirements.

**Response 2:**

Condition D.1.5 limits actual VOC emissions from EU-12 to less fifteen (15) pounds per day to exempt it from the requirements of 326 IAC 8-2-9. There are no changes to the permit as a result of this comment.

**Comment 3:**

Emission units EU-12 and EU-26 are identical. Please modify Condition D.1.5 to include emission unit EU-26.

**Response 3**

**D.1.5 Volatile Organic Compounds (VOC) Limitations**

---

The zinc plating/chromate treatment dip process identified as EU-12 **and EU-26** shall be limited such that the actual VOC emissions **from each emission unit** will be less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 will not apply to emission units **EU-12 and EU-26**.

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

**FESOP Monthly Report**

Source Name: Indiana Automotive Fastener, Inc.  
Source Address: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Mailing Address: 1300 West Anderson Boulevard, Greenfield, IN 46140  
FESOP Permit No.: F059-21946-00024  
Facility: Emission Units EU-12 and EU-26  
Parameter: VOC Emissions  
Limit: Less than 15 lbs per day each

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

Day	Day
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 deviation occurred in this month.

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

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

Attach a signed certification to complete this report.

**Comment 4:**

An application for a permit modification to add an oil quench line, OQ-6, was submitted on July 25, 2007 (No. 059-25037-00024) and combined with this FESOP permit. Please add the oil quench line, OQ-6 to this FESOP permit.

**Response 4:**

Insignificant Emission unit OQ-6 has been added as a permitted insignificant activity shown below. Since emission unit OQ-6 is not regulated by any specific rules, it has not been included in Condition A.3 and Section D.1. There are no changes to the permit as a result of this comment.

**(ac) One (1) Tempering Oven Line for heat treatment of metal fasteners (OQ06), constructed in 2007, consisting of a CO2 generator rated at 0.078 MMBtu/hr (EU-35), a natural gas fired tempering oven rated at 0.16 MMBtu/hr with a gas curtain rated at 0.01 MMBtu/hr and an electric quench oven with a oil quench tank (EU-36), with a maximum capacity of 7000 lb/hr of metal fasteners, and exhausting to stacks V35, V36A, V36B and V36C.**

**Comment 5:**

Condition D.1.6 describes regulations related to solvent spraying from EU-22. EU-22 is a dip coating operation and solvent is not sprayed. Water is used for cleanup and dilution. Please remove this condition.

**Response 5:**

Condition D.1.6 has been modified as shown below:

**D.1.6 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]**

Pursuant to 326 IAC 8-2-9(f), **when using solvents for clean-up at emission units EU-22 and EU-9**, all solvents sprayed from the emission units EU-22 and EU-9 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Upon further review, IDEM has made the following modifications to the final permit. Changes made to the permit as a result of the comments are shown in bold and deleted permit language is shown with a line through it.

Operation Permit No.: F059-21946-00024	
Issued by: <del>Nisha Sizemore, Chief</del> <b>Matthew Stuckey, Deputy Branch Chief</b> Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

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

Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP)

**Source Background and Description**

Source Name:	Indiana Automotive Fasteners, Inc.
Source Location:	1300 West Anderson Boulevard, Greenfield, IN 46140
County:	Hancock
SIC Code:	3452
Operation Permit No.:	F059-21946-00024
Permit Reviewer:	Ganesh Srinivasan/EVP

The Office of Air Quality (OAQ) has reviewed an application from Indiana Automotive Fasteners, Inc. relating to the operation of a facility manufacturing bolts and nuts.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) SBL shot blasters (DC1), identified as EU-8a and EU-8b, constructed in 1996, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
- (b) Two (2) SBL shot blasters (DC2), identified as EU-20a, and EU-20b, constructed in 1996, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;

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

- (a) Two (2) electric annealing ovens, identified as EU-1b and EU-1c, constructed in 1996, and exhausting to stacks V1A and V1b;
- (b) One (1) electric tempering oven, identified as EU-3b, constructed in 1996, and exhausting to stack V3b;
- (c) One (1) electric quench oil oven, identified as EU-4b, constructed in 1996, and exhausting to stack V4b;
- (d) One (1) natural gas fired dacrotizing oven, identified as EU-9-1, constructed in 1996, rated at 1.0 MMBtu/hr, and exhausting to stacks V9 and V9-1, respectively;
- (e) One (1) natural gas fired container wash oven, identified as EU-13, constructed in 1996, rated at 1.0 MMBtu/hr, and exhausting to stack V13; and
- (f) One (1) Plating treatment dip tank, identified as EU-19, constructed in 1996, coating a maximum of 162,000 fasteners per hour, and venting to stack V19.

### Insignificant Activities

- (a) Fifty-seven (57) head forming machines and two (2) nut forming machines, identified as EU-6, constructed between 1996 and 2007, each processing a maximum of 12,000 fasteners per hour, each controlled by a Smog Hog Electrostatic Precipitator, twenty-nine of the head forming machines exhausting to stacks V6:1-9 and the remaining machines exhausting within the building; [326 IAC 2-8-4]
- (b) Two (2) natural gas fired boilers, identified as EU-15, and EU-15-1, constructed in 1996, each rated at 2.1 MMBtu/hr, and exhausting to stacks V15 and V15-1; [326 IAC 6-2-4]
- (c) One (1) natural gas fired boiler, identified as EU-16, rated at 1.2 MMBtu/hr, constructed in 1996, and exhausting to stack V16; [326 IAC 6-2-4]
- (d) One (1) zinc plating/chromate treatment dip process (BZ1), identified as EU-12, constructed in 1996, coating a maximum of 162,000 fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V12;
- (e) One (1) dip coating operation and natural gas fired dry-off oven (DC2), identified as EU-22, rated at 0.7 MMBtu/hr, processing a maximum of 248,000 fasteners per hour and exhausting to stacks V22-A and V22-B; [326 IAC 8-2-9]
- (f) One (1) natural gas fired dacrotizing ovens (DC1), identified as EU-9, constructed in 1996, rated at 0.7 MMBtu/hr, processing a maximum of 80,000 fasteners per hour and exhausting to stacks V9 and V9-1 respectively;
- (g) One (1) electric zinc plating oven (BZ1), identified as EU-10, constructed in 1996, and exhausting to stack V10;
- (h) One (1) 7,000 gallon hydrochloric acid (HCL) storage tank, identified as EU-18, constructed in 1996, controlled by a scrubber, and exhausting to stack V26;
- (i) One (1) cleaner wash and natural gas fired dry-off oven (DC2), identified as EU-21, rated at 0.3 MMBtu/hr, processing 1550 pounds of fasteners per hour and exhausting to stacks V21-A and V21-B;
- (j) One (1) top coating operation and natural gas fired dry-off oven (DC2), identified as EU-23, rated at 0.16 MMBtu/hr, processing a maximum of 400 pounds of fasteners per hour and exhausting to stacks V23-A and V23-B;
- (k) Two (2) natural gas CO<sub>2</sub> generators, identified as EU-24, each rated at 0.078 MMBtu/hr, and exhausting to stack V24;
- (l) One (1) tempering oven line for heat treatment of metal fasteners (OQ02), identified as EU-25, consisting of an electric quench oven with a oil quench tank, and natural gas fired tempering oven rated at 0.16 MMBtu/hr with a natural gas flame curtain rated at 0.01 MMBtu/hr, with a maximum capacity of 7000 lb/hr fasteners and exhausting to stacks V25A, V25B, V25C and V25D;
- (m) One (1) BZ line (BZ2) for applying zinc and chrome coating to metal fasteners, including one (1) electric furnace, identified as EU-27, and a zinc plating/chromate treatment dip process, controlled by a scrubber, identified as EU-26, with a maximum capacity of 3300 lb/hr, and exhausting to stacks, V27 and V26, respectively;

- (n) One (1) natural gas CO<sub>2</sub> generator, identified as EU-28, rated at 0.078 MMBtu/hr, and exhausting to stack V28;
- (o) One (1) Tempering Oven line for heat treatment of metal fasteners (OQ03), consisting of an electric quench oven with a oil quench tank, and natural gas fired tempering oven rated at 0.16 MMBtu/hr with natural gas curtain rated at 0.01 MMBtu/hr (EU-29), with a maximum capacity of 7000 lb/hr, and exhausting to stacks V29A, V29B, and V29C;
- (p) One (1) natural gas CO<sub>2</sub> generator, identified as EU-30, rated at 0.078 MMBtu/hr, and exhausting to stack V28;
- (q) One (1) Tempering Oven line for heat treatment of metal fasteners (OQ04), consisting of an electric quench oven with a natural gas flame curtain and oil quench tank, and natural gas fired tempering oven rated at 0.16 MMBtu/hr with natural gas curtain rated at 0.01 MMBtu/hr (EU-31), with a maximum capacity of 7000 lb/hr, and exhausting to stacks V31A, V31B, and V31C;
- (r) One (1) natural gas CO<sub>2</sub> generator, identified as EU-32, rated at 0.078 MMBtu/hr, and exhausting to stack V32;
- (s) One (1) Tempering Oven line for heat treatment of metal fasteners (OQ05), consisting of an electric quench oven with a oil quench tank, and natural gas fired tempering oven rated at 0.16 MMBtu/hr with natural gas curtain rated at 0.01 MMBtu/hr (EU-33), with a maximum capacity of 7000 lb/hr of metal fasteners, and exhausting to stacks V33A, V33B, and V33C; and
- (t) One (1) LOQ line, identified as EU-34, for heat treatment of metal fasteners, with a maximum capacity of 294 lb/hr of metal fasteners, consisting of one (1) pre wash/dry unit, four (4) natural gas-fired quenching furnaces, each rated at 0.34 MMBtu/hr and exhausting to stacks V34C, V34D and V34K, four (4) oil quenches, one (1) post wash/dry unit exhausting to stack V34E, quench oil spray, two (2) natural gas-fired tempering furnaces, each rated at 0.18 MMBtu/hr and exhausting to stack V34F, three (3) electric tempering furnaces exhausting to stack V34G, five (5) cooling chambers exhausting to stacks V34H and V34I, and one (1) gas generator exhausting to stack V34J.
- (u) One (1) cleaner wash and natural gas fired dry-off oven (DC1), identified as EU-7, rated at 0.3 MMBtu/hr, processing a maximum of 80,000 fasteners per hour and exhausting to stacks V7A and V7B;
- (v) One (1) natural gas fired bake oven (TC), identified as EU-14 rated at 0.4 MMBtu/hr, processing a maximum of 76,000 fasteners per hour and exhausting to stack V14; and
- (w) One (1) electric annealing oven (LAN), identified as EU-1, constructed in 1996, and exhausting to stacks V1a and V1b;
- (x) One (1) electric blueing oven (AOQ), identified as EU-2, constructed in 1996, and exhausting to stacks V1c and V1d;
- (y) One (1) electric tempering ovens (OQ01), identified as EU-3, constructed in 1996, and exhausting to stacks V3;
- (z) One (1) electric quench oil ovens (OQ01), identified as EU-4, constructed in 1996, and exhausting to stacks V4;

- (aa) One (1) oil quench dip bath (OQ01), identified as EU-5, constructed in 1996, quenching a maximum of 360,000 fasteners per hour, and exhausting to stacks V5; and
- (ab) One (1) F-140 solvent parts washer, using 22,400 pounds of solvent per year.

**Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP 059-12739-00024, issued on February 5, 2001;
- (b) First Notice Only Change: 059-15200-00024, issued on January 30, 2002;
- (c) Second Notice Only Change: 059-18386-00024, issued on June 4, 2004; and
- (d) Third Notice Only Change: 059-21054-00024, issued on April 22, 2005.

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (FT)	Diameter (FT)	Flow Rate (acfm)	Temperature (°F)
V1a, V1b	Electric Annealing Ovens	40	1.25	1450	400
V1c, V1d	Electric Blueing Oven	40	1.25	160	300
V3	Electric Tempering Oven	32	1.25	1540	400
V4	Electric Quench Oven	32	1.6	3200	140
V5	Oil Quench Dip Bath	32	1.25	1540	400
V6:1-11	47 head forming machines, 2 nut forming machines	40	1.0/1.33	37800	180
V7A, V7B	Cleaner wash and natural gas fired dry off oven	32	1.25	1440	212
V8	SBL shot blasting	32	1.25	3775	75
V9, V9-1	Natural gas fired dactotizing ovens	32	1.25	1440/254	212
V10	Electric zinc plating oven	32	1.67	500	392
V12	Zinc plating/chromate treatment dip process	46.8	4	10866	100
V14	Bake oven	32	1.75	10	176
V15	Natural gas fired boiler	32	1.75	814	400
V15-1	Natural gas fired boiler	32	1.75	814	400
V16	Natural gas fired boiler	32	0.75	1200	400

Stack ID	Operation	Height (FT)	Diameter (FT)	Flow Rate (acfm)	Temperature (°F)
V20	shot blasting	32	1.25	3775	ambient
V21A, V21B	Cleaner wash and natural gas fired dry off oven	32	1.25	1440	212
V22A, V22B	Dip coating operation and natural gas fire dry off oven	32	1.0	1440	212
V23A, V23B	Top coating operation and natural gas fired dry off oven	27	0.67	500	175
V24	Two (2) natural gas CO2 generator	32	0.67	2150	250
V25A, V25B, V25C, V25D	electric quench oven with natural gas flame curtain and oil quench tank	32	1.25	1550	400
V26	Zinc plating/chromate treatment dip process	46.8	3.83	50000	100
V27	Electric zinc/chrome plating furnace	46.8	1	500	392
V28	Natural gas CO2 generator	32	0.67	2150	250
V29A, V29B, V29C	Electric tempering oven with natural gas flame curtain and oil quench tank	32	1.25	1550	400
V31A, V31B, V31C	Electric tempering oven with natural gas flame curtain and oil quench tank	32	1.25	1550	400
V32	Natural gas CO2 generator	32	0.67	2150	250
V33A, V33B, V33C	Electric tempering oven with natural gas flame curtain and oil quench tank	32	1.25	1550	400
V34A	One prewash/dry unit, washer 01	30	1.5	2200	250
V34B	One prewash/dry unit, washer 01	30.5	1.16	2000	400
V34C	Two natural gas fired quenching furnaces, OQ11 & OQ12 with four oil quenches	30.5	1.5	2600	250
V34D	Two natural gas fired quenching furnaces, OQ13 & OQ14 with four oil quenches	30.5	1.5	2600	250
V34E	One post wash/dry unit, washer 02	30	1.16	2000	400

Stack ID	Operation	Height (FT)	Diameter (FT)	Flow Rate (acfm)	Temperature (°F)
V34F	Two natural gas fired tempering furnaces	30.5	1.16	3600	400
V34G	Three electric tempering furnaces	30.5	1.8	4200	250
V34H	Three cooling chambers	30	1.5	3600	250
V34I	Two cooling chambers	30.5	1.5	3600	250
V34J	Gas generator	30	1.16	2000	250
V34K	4 natural gas fired quenching furnaces OQ 11-14	30	1.8	6200	250

### Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 7).

### County Attainment Status

The source is located in Hancock County

Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Attainment
SO <sub>2</sub>	Attainment
NOx	Attainment
8-hour Ozone	Non-Attainment
CO	Attainment
Lead	Attainment

- (a) Hancock County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire 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 emissions are considered when evaluating the rule applicability relating to ozone standards. Hancock County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (c) Hancock County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (e) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	246.93
PM-10	104.44
SO <sub>2</sub>	0.03
VOC	14.19
CO	3.70
NO <sub>x</sub>	4.41

HAPs	tons/year
Hydrochloric Acid	3.51
Methanol	4.70
Chromium Compounds	2.72
Total	11.02

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM10 emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (d) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### Actual Emissions

No previous emission data has been received from the source.

### Potential to Emit After Issuance

The source has opted to be a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO2	VOC	CO	NOx	HAPs
Natural Gas Combustion	0.08	0.34	0.03	0.24	3.70	4.41	0.08
Abrasive Blasting	38.01	38.01	0.00	0.00	0.00	0.00	0.00
Hydrochloric Acid Storage	0.00	0.00	0.00	0.00	0.00	0.00	3.51
Headforming Machines	60.97	60.97	0.00	9.81	0.00	0.00	0.00
Miscellaneous Activities	0.00	0.00	0.00	4.14	0.00	0.00	7.43
<b>Total Emissions</b>	<b>&lt; 99<sup>1</sup></b>	<b>&lt; 99<sup>1</sup></b>	<b>0.03</b>	<b>14.19</b>	<b>3.70</b>	<b>4.41</b>	<b>11.02</b>

<sup>1</sup> Pursuant to 326 IAC 2-8-4, PM/PM10 sourcewide emissions shall be limited to less than 99 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 is not applicable.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Emission Offset because the emissions of the nonattainment pollutant, NOx and VOC are less than one hundred (<100) tons per year.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) This source is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.340, Subpart N because the chromium dip tank, identified as EU-27 is not a electrolytic process tank, as defined in 40 CFR 63.340(c). Therefore, the requirements of National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks are not applicable.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.

**State Rule Applicability – Entire Source**

**326 IAC 2-2 (Prevention of Significant Deterioration, PSD)**

Pursuant to 326 IAC 2-2 (PSD), this existing minor source, originally constructed in 1996 after the August 7, 1977 rule applicability date, is not considered a major source. This source is not one of the 28 listed source categories and it has never operated at, and does not have the potential to emit of 250 tons per year (tpy) or more of any regulated pollutant. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

326 IAC 2-3 (Emission Offset)

Hancock County was designated as nonattainment for the 8-hour ozone standard. VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. The source wide potential to emit of VOC and NO<sub>x</sub> is 4.65 and 3.68 tons per year respectively. The source is classified as minor for the purpose of Emission Offset.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because the source has PTE of any HAP less than 10 tons per year and PTE of any combination of HAPs less than 25 tons per year. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Hancock County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to 326 IAC 2-8-4 (FESOP), PM-10 emissions from:

- (a) The four (4) shot blasters (EU-8a, EU-8b, EU-20a and EU-20b) shall be limited to 2.17 pounds per hour, each, including both filterable and condensable fractions; and
- (b) The fifty seven (57) head forming machines and two (2) nut forming machines (EU-6) shall be limited to 0.244 pounds per hour, each, including both filterable and condensable fractions.

Compliance with these limits combined with potential PM10 emissions from other emission units shall limit PM10 emissions to less than 100 tons and render the Part 70 rules (326 IAC 2-7) not applicable.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability – Individual Facilities**

326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating)

The three (3) natural gas-fired boilers (EU-15, EU-15-1 and EU-16), rated at 2.1, 2.1 and 1.2 MMBtu/hr, respectively, constructed in 1996, are subject to 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the chiller shall be limited by the following equation:

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

Where: Pt = pounds of particulate matter emitted per million Btu of heat input  
Q = total source maximum operating capacity rating in million Btu per hour  
heat input = 12.6 MMBtu/hr

$$Pt = 1.09 / (5.4)^{0.26}$$

$$Pt = 0.70 \text{ pounds per MMBtu}$$

The potential worst case emissions from the boilers of 0.0074 lb/MMBtu of particulate matter are less than the allowable 0.70 lb/MMBtu. Therefore, the boilers are in compliance with this rule.

Pursuant to this rule, PM emissions from sources with a total heat capacity less than 10 MMBtu/hr shall not exceed 0.6 pounds of particulate matter emitted per MMBtu. Therefore the PM emissions from the boilers shall not exceed 0.6 pounds per MMBtu heat input.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from different emission units at the sources shall be limited as listed below:

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

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

(a) Shot blaster EU-8a:

$$P = (773 \text{ lb/hr}) * (1 \text{ ton} / 2000 \text{ lbs}) = 0.386 \text{ tons/hr}$$

$$E = 4.10 * (0.386)^{0.67} = 2.17 \text{ lb/hr}$$

(b) Shot blaster EU-8b:

$$P = (773 \text{ lb/hr}) * (1 \text{ ton} / 2000 \text{ lbs}) = 0.386 \text{ tons/hr}$$

$$E = 4.10 * (0.386)^{0.67} = 2.17 \text{ lb/hr}$$

(c) Shot blaster EU-20a:

$$P = (775 \text{ lb/hr}) * (1 \text{ ton} / 2000 \text{ lbs}) = 0.387 \text{ tons/hr}$$

$$E = 4.10 * (0.387)^{0.67} = 2.17 \text{ lb/hr}$$

(d) Shot blaster EU-20b:

$$P = (775 \text{ lb/hr}) * (1 \text{ ton} / 2000 \text{ lbs}) = 0.387 \text{ tons/hr}$$

$$E = 4.10 * (0.387)^{0.67} = 2.17 \text{ lb/hr}$$

The baghouse shall be in operation at all times the abrasive blasting equipment is in operation, in order to comply with this limit.

- (e) Head forming machines EU-6:

$P = (12,000 \text{ fasteners/hour per machine}) * (0.1 \text{ oz / fastener}) * (1 \text{ lb / 16 oz}) * (1 \text{ ton/ 2000 lbs})$

$P = 0.0375 \text{ tons/hour}$

$E = 4.10 * (0.0375)^{0.67} = 0.454 \text{ lb/hr}$

Pursuant to 326 IAC 6-3-2(b)(14), manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are exempt. Therefore, 326 IAC 6-3-2 does not apply to the head forming machines (EU-6).

- (f) Pursuant to 326 IAC 6-3-2(b)(5), surface coating operations using dip coating are exempt. Therefore, 326 IAC 6-3-2 does not apply to dip coating lines EU-22 and EU-12.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the dip coating lines (EU-22) shall be limited to 3.5 pounds of VOCs per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

The spray booth will comply with this requirement by using compliant spraying material.

The zinc plating/chromate treatment dip process identified as EU-12 shall be limited such that the actual VOC emissions will be less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 will not apply to emission unit EU-12.

#### Recommendation

The staff recommends to the Commissioner that the operation 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 March 21, 2007.

#### Conclusion

The operation of this facility manufacturing bolts and nuts shall be subject to the conditions of this FESOP permit F059-21946-00024.

## Appendix A: Emission Calculations

**Company Name:** Indiana Automotive Fasteners  
**Address City IN Zip:** 1300 West Anderson Boulevard, Greenfield, IN 46140  
**Permit Number:** F059-21946-00024  
**Reviewer:** GS / EVP

Uncontrolled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Natural Gas Combustion	Abrasive Blasting	Hydrochloric Acid Storage	Headforming Machines	Miscellaneous Activities	Total
PM	0.08	158.60	0.00	88.25	0.00	246.93
PM10	0.34	15.86	0.00	88.25	0.00	104.44
SO2	0.03	0.00	0.00	0.00	0.00	0.03
NOx	4.41	0.00	0.00	0.00	0.00	4.41
VOC	0.24	0.00	0.00	9.81	4.14	14.19
CO	3.70	0.00	0.00	0.00	0.00	3.70
total HAPs	0.08	0.00	3.51	0.00	7.43	11.02
worst case single HAP	0.08	0.00	3.51	0.00	4.70	4.70

Limited Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Natural Gas Combustion	Abrasive Blasting	Hydrochloric Acid Storage	Headforming Machines	Miscellaneous Activities	Total
PM	0.08	38.01	0.00	60.97	0.00	< 99
PM10	0.34	38.01	0.00	60.97	0.00	< 99
SO2	0.03	0.00	0.00	0.00	0.00	0.03
NOx	4.41	0.00	0.00	0.00	0.00	4.41
VOC	0.24	0.00	0.00	9.81	4.14	14.19
CO	3.70	0.00	0.00	0.00	0.00	3.70
total HAPs	0.08	0.00	3.51	0.00	7.43	11.02
worst case single HAP	0.08	0.00	3.51	0.00	4.70	4.70

**Appendix A: Process Particulate Emissions  
Head forming and Nut forming Machines**

**Company Name:** Indiana Automotive Fasteners  
**Address City IN Zip:** 1300 West Anderson Boulevard, Greenfield, IN 46140  
**Permit Number:** F059-21946-00024  
**Reviewer:** GS / EVP

<b>Uncontrolled Potential Emissions (tons/year)</b>						
<b>Electrostatic Precipitators (ESP)</b>						
<b>Process</b>	<b>No. of Units</b>	<b>Grain Loading per Actual Standard Cubic Foot of Outlet</b>	<b>Face Velocity Across the Plates (ft/sec)</b>	<b>Total Face Surface Area (ft<sup>2</sup>)</b>	<b>Control Efficiency</b>	<b>Total (tons/yr)</b>
EU #6	59	0.00100	8.3	8.0	90.00%	88.25
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						<b>88.25</b>

<b>Controlled Potential Emissions (tons/year)</b>						
<b>Electrostatic Precipitators (ESP)</b>						
<b>Process</b>	<b>No. of Units</b>	<b>Grain Loading per Actual Standard Cubic Foot of Outlet</b>	<b>Face Velocity Across the Plates (ft/sec)</b>	<b>Total Face Surface Area (ft<sup>2</sup>)</b>	<b>Control Efficiency</b>	<b>Total (tons/yr)</b>
EU #6	59	0.00100	8.3	8.0	90.00%	8.82
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls						<b>8.82</b>

Methodology:

Uncontrolled Emissions

ESP (tons/yr) = No. Units \* Loading (grains/acf) \* Face Velocity (ft/sec) \* Surface Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 sec/min \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs \* 1/(1-Control Efficiency)

Controlled Emissions

ESP (tons/yr) = No. Units \* Loading (grains/acf) \* Face Velocity (ft/sec) \* Surface Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 sec/min \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs

**Appendix A: Emission Calculations  
Abrasive Blasting - Confined  
EU-8a, EU-8b, EU-20a and EU-20b**

**Company Name:** Indiana Automotive Fasteners  
**Address City IN Zip:** 1300 West Anderson Boulevard, Greenfield, IN 46140  
**Permit Number:** F059-21946-00024  
**Reviewer:** GS / EVP

Process	Rate (tons/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled Emissions (ton/yr)	Type of control	Control Efficiency (%)	Controlled Emissions (ton/yr)
EU-8a, EU-8b, EU-20a and EU-20b	2.13	PM	17.00	158.60	Baghouse	98.00%	3.17
		PM-10	1.70	15.86	Baghouse	98.00%	0.32

Note: Emissions factors from USEPA's Factor Information Retrieval Data System, version 6.25 (SCC# 3-04-003-40)

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name:** Indiana Automotive Fasteners  
**Address City IN Zip:** 1300 West Anderson Boulevard, Greenfield, IN 46140  
**Permit Number:** F059-21946-00024  
**Reviewer:** GS / EVP

Emission Unit	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
EU-9	0.7	
EU-15	2.1	
EU-15-1	2.1	
EU-16	1.2	
EU-21	0.3	
EU-22	0.7	
EU-23	0.16	
Misc.	2.81	
<b>Total</b>	<b>10.07</b>	<b>88.2</b>

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.08	0.34	0.03	4.41	0.24	3.70

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

(SUPPLEMENT D 3/98)

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

See next page for HAPs emissions calculations.

## Natural Gas Combustion Only

MM BTU/HR &lt;100

## Small Industrial Boiler

## HAPs Emissions

**Company Name:** Indiana Automotive Fasteners  
**Address City IN Zip:** 1300 West Anderson Boulevard, Greenfield, IN 46140  
**Permit Number:** F059-21946-00024  
**Reviewer:** GS / EVP

## HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr (existing)	9.26E-05	5.29E-05	3.31E-03	7.94E-02	1.50E-04

## HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total
Potential Emission in tons/yr (existing)	2.205E-05	4.852E-05	6.175E-05	1.676E-05	9.262E-05	8.32E-02

Methodology is the same as page 4.

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

**Appendix A: Emissions Calculations  
VOC and Particulate**

**Company Name:** Indiana Automotive Fasteners  
**Address City IN Zip:** 1300 West Anderson Boulevard, Greenfield, IN 46140  
**Permit Number:** F059-21946-00024  
**Reviewer:** GS / EVP

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/year)	Actual hours (hours/year)	Percent Recovered	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Ib VOC/gal solids	Transfer Efficiency
<b>Headforming Machines (EU-6)</b>																	
Apollo Hydraulic Fluid AW-68	7.4	80.00%	0.0%	80.0%	0.0%	0.00%	17733	6000.000	90.00%	5.90	5.90	1.74	41.82	7.63	0.00	NA	100%
<b>Zinc Plater (EU-12)</b>																	
Ekolasid 455 Brightener	9.3	10.00%	0.0%	10.0%	0.0%	90.00%	440	6000.000	90.00%	0.93	0.93	0.01	0.16	0.03	0.00	1.03	100%
<b>Dip Coating (EU-22)</b>																	
Geomet 720	12.5	90.00%	47.0%	43.0%	0.0%	46.00%	11997	6864.000	90.00%	1.30	5.38	0.94	22.55	4.11	0.00	11.68	100%
<b>Chromate Dips (EU-12)</b>																	
Zinc P-1119	10.1	85.00%	0.0%	85.0%	0.0%	15.00%	2	6000.000	90.00%	8.59	8.59	0.00	0.01	0.00	0.00	57.23	100%
<b>Rolling Oil (EU-6)</b>																	
Daphne Fluid 10-U	7.3	90.00%	0.0%	90.0%	0.0%	0.00%	4560	6000.000	90.00%	6.53	6.53	0.50	11.92	2.18	0.00	NA	100%

<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>	<b>3.19</b>	<b>76.46</b>	<b>13.95</b>	<b>0.00</b>
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Note : The rolling oil and the hydraulic fluid for the headforming machines are not used for surface coating.

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* [Gal of Material (gal/year) / Actual hours (hours/year)] \* (1-percent recovered)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* [Gal of Material (gal/year) / Actual hours (hours/year) \* (24 hr/day) \* (1-percent recovered)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* [Gal of Material (gal/year) / Actual hours (hours/year)] \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = [(gal/year) / (hours/year)] \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs) \* (1-percent recovered)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name:** Indiana Automotive Fasteners  
**Address City IN Zip:** 1300 West Anderson Boulevard, Greenfield, IN 46140  
**Permit Number:** F059-21946-00024  
**Reviewer:** GS / EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/hour)	Weight % Hydrochloric Acid	Weight % Methanol	Weight % Chromium Compounds	Hydrochloric Acid Emissions (ton/yr)	Methanol Emissions (ton/yr)	Chromium Compounds Emissions (ton/yr)
<b>Zinc Plater (EU-12)</b>								
Hydrochloric Acid	9.68	0.26	31.50%	0.00%	0.00%	3.51	0.00	0.00
Ekolasid 455 Brightener	9.26	0.05	0.00%	10.00%	0.00%	0.00	0.20	0.00
<b>Dip Coating (EU-22)</b>						0.00	0.00	0.00
Geomet 720	12.5	1.37	0.00%	6.00%	0.00%	0.00	4.50	0.00
Dacromet DX-380 LV	11.35	1.10	0.00%	0.00%	5.00%	0.00	0.00	2.72

Total State Potential Emissions **3.51      4.70      2.72**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* [Gal of Material (gal/hour) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs]