



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: February 3, 2006
RE: Rightway Fasteners, Inc. / 005-22422-00048
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER-MOD.dot 1/10/05



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100 North Senate Avenue
Indianapolis, Indiana 46204-2251
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February 3, 2006

Mr. Doug Logan
Rightway Fasteners, Inc.
7945 S. International Drive
Columbus, IN 47201

Re: **005-22422-00048**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 005-7301-00048**

Dear Mr. Logan:

Rightway Fasteners, Inc. was issued Part 70 Operating Permit T005-7301-00048 on March 18, 1999, for a stationary metal products and fasteners manufacturing plant. An application to modify the source was received on December 21, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission unit is approved for construction at the source:

- One (1) dip/spin coater and cure oven, to be constructed in 2006, identified as E-Line, with a maximum capacity 4,000 pounds of fasteners per hour, and the cure oven venting to stacks EO1, EO2, and EO3.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jenny Acker, at (800) 451-6027, and ask for Jenny Acker or extension 2-8253, or dial (317) 232-8253.

Sincerely,
Origin signed by

Nisha Sizemore, Section Chief
Permits Branch
Office of Air Quality

Attachments

JLA

cc: File – Bartholomew County
Bartholomew County Health Department
Air Compliance Section Inspector – Vaughn Ison
Compliance Branch
Administrative and Development Section
Billing, Licensing and Training



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T005-7301-00048	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 18, 1999 Expiration Date: March 18, 2004
Reopening No.: R-005-13153-00048, issued December 31, 2001 Minor Source Modification No.: 005-21382-00048, issued September 27, 2005 Minor Permit Modification No.: 005-21625-00048, issued January 4, 2006	
Minor Source Modification No: 005-22422-00048	
Issued by: Origin signed by Nisha Sizemore, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 3, 2006

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

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

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

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

- (a) One (1) Sonicor model LDR-09 vapor degreaser for fasteners (ID B-Line), with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel parts per hour.
- (b) One (1) degreasing tank, designated as #1, with a capacity of 354 gallons.
- (c) One (1) degreasing tank, designated as #2, with a capacity of 712 gallons.
- (d) One (1) electrocleaning tank which has a capacity of 354 gallons.
- (e) One (1) automated alkaline zinc electroplating line with a maximum capacity of 4,100 gallons.

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

- (k) One (1) dip/spin coater and cure oven, to be constructed in 2006, identified as E-Line, with a maximum capacity 4,000 pounds of fasteners per hour, and the cure oven venting to stacks EO1, EO2, and EO3.

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

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

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (b) Other activities or categories not previously identified:
Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only.

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

Hazardous Air Pollutants (HAPs)

For any unit not regulated by a National Emission Standard for HAPs (NESHAP), HAPs = 5 lbs/day or 1 tons/year of any single HAP

For any unit not regulated by a National Emission Standard for HAPs (NESHAP), HAPs = 12.5 lbs/day or 2.5 tons/year of any combination of HAPs

- (1) Metal Surface coating with waterborne materials.
- (c) One (1) natural gas-fired boiler, with a heat input of 1.5 MMBtu/hr, venting to stack P-B-1.
- (d) One (1) natural gas-fired boiler, with a heat input of 1.39 MMBtu/hr, venting to stack

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

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

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

(a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

SECTION D.3

FACILITY OPERATION CONDITIONS

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

Insignificant Activity:

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

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day
Sulfur Dioxide (SO₂) = 5 lbs/hr or 25 lbs/day
Nitrogen Oxides (NO_x) = 5 lbs/hr or 25 lbs/day
Particulate Matter (PM) = 5 lbs/hr or 25 lbs/day
Carbon monoxide (CO) = 25 lbs/day
Volatile Organic Compounds (VOC) = 3 lbs/hr or 15 lbs/day

Hazardous Air Pollutants (HAPs)

For any unit not regulated by a National Emission Standard for HAPs (NESHAP), HAPS = 5 lbs/day or 1 tons/year of any single HAP

For any unit not regulated by a National Emission Standard for HAPs (NESHAP), HAPS = 12.5 lbs/day or 2.5 tons/year of any combination of HAPs

- (1) Metal Surface coating with waterborne materials.

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

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

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

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

Compliance Determination Requirements

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

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

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

There are no Compliance Monitoring requirements applicable to this facility.

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

D.3.3 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

SECTION D.6 FACILITY OPERATION CONDITIONS

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

- (k) One (1) dip/spin coater and cure oven, to be constructed in 2006, identified as E-Line, with a maximum capacity 4,000 pounds of fasteners per hour, and the cure oven venting to stacks EO1, EO2, and EO3.

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

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

D.6.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge of VOC into the atmosphere in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.6.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents applied to the application equipment of the dip/spin coater during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent application is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Compliance Determination Requirements

D.6.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitation contained in Condition D.6.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.6.4 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.6.1.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used less water 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 cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and ,
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.5 Reporting Requirements

There are no Reporting requirements applicable to this facility.

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

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

Source Description and Location

Source Name:	Rightway Fasteners, Inc.
Source Location:	7945 S. International Drive, Columbus, Indiana 47201
County:	Bartholomew
SIC Code:	3452, 3479
Operation Permit No.:	T005-7301-00048
Operation Permit Issuance Date:	March 18, 1999
Minor Source Modification No.:	005-22422-00048
Minor Permit Modification No.:	005-22549-00048
Permit Reviewer:	Jenny Acker

Existing Approvals

The source was issued Part 70 Operating Permit No. T005-7301-00048 on March 18, 1999. The source has since received the following approvals:

- (a) Reopening No. R-005-13153-00048, issued December 31, 2001
- (b) Minor Source Modification No.: 005-21382-00048, issued September 27, 2005
- (c) Minor Permit Modification No.: 005-21625-00048, issued January 4, 2006

County Attainment Status

The source is located in Bartholomew County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) 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 and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Bartholomew County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x

emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Bartholomew County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Bartholomew County has been classified as attainment or unclassifiable for PM10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) 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.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	Less than 100
PM10	Less than 100
SO ₂	Less than 100
VOC	Less than 100
CO	Less than 100
NO _x	Less than 100

Note: Emissions are from the Technical Support Document (TSD) for Minor Permit Modification No. 005-21625-00048.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0
PM10	Not reported
SO ₂	0

Pollutant	Actual Emissions (tons/year)
VOC	0
CO	1
NO _x	1
HAP	Not reported

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Rightway Fasteners, Inc. on December 21, 2005, relating to addition of a coating line, identified as E-Line Coater, which will consist of a dip/spin coater and a cure oven. The following is a list of the proposed emission unit.

- One (1) dip/spin coater and cure oven, to be constructed in 2006, identified as E-Line, with a maximum capacity 4,000 pounds of fasteners per hour, and the cure oven venting to stacks EO1, EO2, and EO3.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
EO1	Cure Oven	35	1.0	2500	392
EO2	Cure Oven	35	0.5	530	392
EO3	Cure Oven	35	0.5	530	392

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
-----------	-------------------------------

Pollutant	Potential To Emit (tons/year)
PM	0.01
PM10	0.05
SO ₂	Neg.
VOC	<25.0
CO	0.51
NO _x	0.30

HAPs	Potential To Emit (tons/year)
CrO3	4.35
Zinc Compounds	2.61
Total HAPs	6.96

This source modification is subject to 326 IAC 2-7-10.5(d)(B)(iii) for modifications which have the potential to emit less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of volatile organic compounds (VOC) and do not require the use of air pollution control devices to comply with applicable requirements of 326 IAC 8. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a minor permit modification issued pursuant to 326 IAC 2-7-12(b)(1), because the permit modification does not violate any applicable requirement and does not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the Part 70 permit.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit modification, 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	PM10	SO ₂	VOC	CO	NO _x
Existing Emission Units	<100	<100	<100	<100	<100	<100
E-Line	0.01	0.05	Neg.	<25.0	0.51	0.30
Significant Level or Major Source Threshold	250	250	250	250	250	250

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

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 636, Subpart M MMM), have not been included in the permit. The Permittee has stated that the source is not an affected source under 40 CFR 63, Subpart M MMM because the following exclusion applies:

This subpart does not apply to surface coating or a coating operation that meets any of the criteria of paragraphs (c)(1) through (17) of this section. [40 CFR 63.3881(c)]

- (1) A coating operation conducted at a facility where the facility uses only coatings, thinners and other additives, and cleaning materials that contain no organic HAP, as determined according to Sec. 63.3941(a). [40 CFR 63.3881(c)(1)]

Where:

- (a) Determine the mass fraction of organic HAP for each material used. You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section. [40 CFR 63.3941(a)]
- (1) Method 311 (appendix A to 40 CFR part 63). You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test. [40 CFR 63.3941(a)(1)]
- (i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.3791). [40 CFR 63.3941(a)(1)(i)]
- (ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763). [40 CFR 63.3941(a)(1)(ii)]
- (2) Method 24 (appendix A to 40 CFR Part 60). For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in appendix A to subpart P PPP of this part, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to subpart P PPP of this part, as a substitute for the mass fraction of organic HAP. [40 CFR 63.3941(a)(2)]
- (3) Alternative method. You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in Sec. 63.7(f) to submit an alternative test method for approval. [40 CFR 63.3941(a)(3)]
- (4) Information from the supplier or manufacturer of the material. You may rely on information other than that generated by the test methods

specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. [40 CFR 63.3941(a)(4)]

- (5) Solvent blends. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to this subpart. If you use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and you may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. [40 CFR 63.3941(a)(5)]

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
E-Line- VOC	N	Y	6.90	6.90	N	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Permit Level Determination - PSD and Emission Offset section.

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

Pursuant to 326 IAC 6-3-1(b)(5), Surface coating using dip coating is exempt from the provisions of 326 IAC 6-3.

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 coating delivered to the applicator at the E-Line shall be limited to 3.5 pounds of VOC per gallon of coating less water for extreme performance coatings.

Solvent applied 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.

Based on the MSDS submitted by the source and calculations made, the spray booth can comply with this requirement.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The Compliance Determination Requirements applicable to this modification are as follows:

The dip/spin coater has applicable compliance determination conditions as specified below:

- (a) Compliance with the VOC content and usage limitation shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

The Compliance Monitoring Requirements applicable to this modification are as follows:

The dip/spin coater has applicable compliance monitoring conditions as specified below:

The Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits.

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent used less water 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 cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and,
- (5) The weight of VOCs emitted for each compliance period.

These monitoring conditions are necessary to ensure compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 005-7301-00048. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Change No. 1: Condition A.1 has been modified to update the responsible official.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

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

Change No. 2: To incorporate the new E-line into the Part 70 Operating Permit, Condition A.2(k) and section D.6 have been added to the Part 70 Operating Permit (005-7301-00048) as follows:

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

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

(a) through (j) remain the same

- (k) One (1) dip/spin coater and cure oven, to be constructed in 2006, identified as E-Line, with a maximum capacity 4,000 pounds of fasteners per hour, and the cure oven venting to stacks EO1, EO2, and EO3.

SECTION D.6 FACILITY OPERATION CONDITIONS

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

- (k) One (1) dip/spin coater and cure oven, to be constructed in 2006, identified as E-Line, with a maximum capacity 4,000 pounds of fasteners per hour, and the cure oven venting to stacks EO1, EO2, and EO3.

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

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

D.6.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge of VOC into the atmosphere in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.6.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents applied to the application equipment of the dip/spin coater during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent application is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Compliance Determination Requirements

D.6.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitation contained in Condition D.6.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.6.4 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.6.1.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent used less water 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 cleanup solvent usage for each month;**
- (4) **The total VOC usage for each month; and,**
- (5) **The weight of VOCs emitted for each compliance period.**
- (b) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.6.5 Reporting Requirements

There are no Reporting requirements applicable to this facility.

Change No. 3: The Insignificant Thresholds listed in Condition A.3(b) and Section D.3 (Facility Description) does not state the limits for Hazardous Air Pollutants (HAPs). Condition A.3(b) and Section D.3 (Facility Description) have been modified as follows:

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

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

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

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

Hazardous Air Pollutants (HAPs)

For any unit not regulated by a National Emission Standard for HAPs (NESHAP), HAPS = 5 lbs/day or 1 tons/year of any single HAP

For any unit not regulated by a National Emission Standard for HAPs (NESHAP), HAPS = 12.5 lbs/day or 2.5 tons/year of any combination of HAPs

- (1) Metal Surface coating with waterborne materials.
- (c) and (d) remain the same

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activity:

- (b) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only.

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day
Sulfur Dioxide (SO₂) = 5 lbs/hr or 25 lbs/day
Nitrogen Oxides (NO_x) = 5 lbs/hr or 25 lbs/day
Particulate Matter (PM) = 5 lbs/hr or 25 lbs/day
Carbon monoxide (CO) = 25 lbs/day
Volatile Organic Compounds (VOC) = 3 lbs/hr or 15 lbs/day

Hazardous Air Pollutants (HAPs)

For any unit not regulated by a National Emission Standard for HAPs (NESHAP), HAPS = 5 lbs/day or 1 tons/year of any single HAP

For any unit not regulated by a National Emission Standard for HAPs (NESHAP), HAPS = 12.5 lbs/day or 2.5 tons/year of any combination of HAPs

- (1) Metal Surface coating with waterborne materials.

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

Change No. 4: The mailing address of IDEM, Office of Air Quality (OAQ) has changed. All references in the permit to "100 North Senate Ave, Post Office Box 6015, Indianapolis, Indiana 46206-6015" have been changed to "100 North Senate Ave, Indianapolis, Indiana 46204-2251".

Change No. 5: The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised as follows:

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

Pursuant to 326 IAC 6-3-2(e)(2), ~~the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and 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.

Change No. 6: The following revisions were made to the Emission Statement condition to incorporate the revisions to 326 IAC 2-6 that became effective March 27, 2004. The revised rule was published in the April 1, 2004 Indiana Register. (04/16/04).

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

- (a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:~~

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous

calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) ~~Indicate actual emissions of criteria pollutants from the source;~~
Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) ~~Indicate actual emissions of other regulated pollutants from the source.~~
Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

Change No. 7: The table of contents has been modified to reflect all changes made to the permit. Where conditions were deleted, subsequent conditions were renumbered as appropriate.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 005-22422-00048 and Minor Permit Modification No.: 005-22549-00048. The staff recommend to the Commissioner that this Part 70 Minor Source and Minor Permit Modification be approved.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler
 E-Line Oven**

Company Name: Rightway Fastners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
MSM Permit Number: 005-22422-00048
MPM Permit Number: 005-22549-00048
Part 70 Operating Permit No.: 005-7301-00048
Reviewer: Jenny Acker
Date: 17-Jan-06

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.4

12.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	50.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.01	0.05	0.00	0.30	0.03	0.51

*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