

March 22, 2006

Mr. Ed James
Specialty Blanks, Incorporated
500 South 9th Street
P.O. Box 3480
Terre Haute, IN 47803-0480

Dear Mr. James:

Re: Exempt Construction and Operation Status,
167-22467-00106

The application from Specialty Blanks, Incorporated, received on December 21, 2005, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following aluminum stamping operation, to be located at 500 South 9th Street and 1140 Crawford Street, Terre Haute, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) natural gas fired batch annealing furnace, identified as Batch Annealing Furnace #39, constructed in 1989, with a maximum heat input of 2.46 MMbtu/hour, using no control and exhausting to stack #3.
- (b) One (1) natural gas fired batch annealing furnace, identified as Batch Annealing Furnace #52, constructed in 1996, with a maximum heat input of 0.8 MMbtu/hour, using no control and exhausting to stacks #1, 2A, 2B, 3, 4.
- (c) One (1) natural gas fired flash annealing furnace, identified as Flash Annealing Furnace, constructed in 1987, with a maximum heat input of 5.0 MMbtu/hour, using no control and exhausting to stacks #0, 1, 2.

The following conditions shall be applicable:

- (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:
 - (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 15 minutes (60 readings) in a 6-hour period 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.
- (2) Pursuant to 326 IAC 6-2-4 (Particulate Emissions From Indirect Heating), the three (3) units are limited to 0.6 pounds per million BTU.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

//Original Signed By//

George M. Needham
Director
Vigo County Air Pollution Control

sbs
cc:
Winter Bottum, IDEM
Mindy Hahn, IDEM

**Indiana Department of Environmental Management
Office of Air Quality
and Vigo County Air Pollution Control**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Specialty Blanks, Incorporated
Source Location:	500 South 9 th St/1140 Crawford St, Terre Haute, IN 47803
County:	Vigo
SIC Code:	3469
Operation Permit No.:	167-22467-00106
Permit Reviewer:	Scott Sines

Vigo County Air Pollution Control (VCAPC) has reviewed an application from Specialty Blanks, Incorporated relating to the construction and operation of a stationary aluminum stamping operation.

Source Definition

The Source Definition from 167-22467-00106 was incorporated into this permit as follows:

This aluminum stamping company consists of two (2) plants:

- (a) Plant 1 is located at 1140 Crawford Street, Terre Haute, IN; and
- (b) Plant 2 is located at 500 South 9th Street, Terre Haute, IN.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

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

One (1) natural gas fired batch annealing furnace, identified as Batch Annealing Furnace #52, constructed in 1996, with a maximum heat input of 0.8 MMbtu/hour, using no control and exhausting to stacks #1, 2A, 2B, 3, 4.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (a) One (1) natural gas fired batch annealing furnace, identified as Batch Annealing Furnace #39, constructed in 1989, with a maximum heat input of 2.46 MMbtu/hour, using no control and exhausting to stack #3.
- (b) One (1) natural gas fired flash annealing furnace, identified as Flash Annealing Furnace, constructed in 1987, with a maximum heat input of 5.0 MMbtu/hour, using no control and exhausting to stacks #0, 1, 2.

Existing Approvals

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

- (a) CP 167-V022 issued on May 28, 1997; and
- (b) CP 167-5326 issued on June 13, 1996

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
0	exhaust	30	1.2 X 1.67	41	400
1	exhaust	26	0.67	4	100
2A	exhaust	30	0.83	83	400
2B	exhaust	30	0.83	83	400
3	exhaust	30	1.2 X 1.7	41	400
4	exhaust	30	0.83	28	400

Recommendation

The staff recommends to the Commissioner that the construction and 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 December 21, 2005, with additional information received on March 6, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1-2).

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions 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, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	0.1
PM-10	0.3
SO ₂	0.0
VOC	0.2

CO	3.0
NO _x	3.6

HAPs	Potential to Emit (tons/yr)
Hexane	0.065
Combined	Less than 10

The potential to emit of pollutants and HAPs are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-2.5	attainment
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
1-hour Ozone	attainment
8-hour Ozone	basic nonattainment
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 the ozone standards. Vigo County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Vigo County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Vigo County has been classified as attainment or unclassifiable 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 for the source section.
- (d) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.1
PM-10	0.3
SO ₂	0.0
VOC	0.2
CO	3.0
NO _x	3.6
Single HAP	0.0
Combination HAPs	0.0

This existing source is **not** a major stationary source because NO_x and CO are not emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 167-22467-00106, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the VCAPC inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this exemption. The source is not subject to 40 CFR Part 60 Subpart Dc due to each emission unit having a maximum heat input of less than 10 MMBtu/hour.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this exemption. The source is not a major source of HAPS and is not subject to 40 CFR Part 63 Subpart DDDDD due to dates of construction being before January 13, 2003.

State Rule Applicability – Entire Source

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

This source is not a major source because the potential to emit of all criteria pollutants is less than 250 tons per year. Therefore 326 IAC 2-2 does not apply.

326 IAC 2-3 (Emission Offset)

This source is not a major source because the potential to emit of volatile organic compounds (VOCs) and NO_x is less than 100 tons per year. Therefore 326 IAC 2-3 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Vigo County, is not required to have a Part 70 operating permit, and does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

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 the 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) This source is not located in the area of Vigo County referenced in 326 IAC 5-1-1(c)(8).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the provisions of 326 IAC 6-5 because it is not required to have a permit as set forth in 326 IAC 2.

326 IAC 1-7 (Stack Height Provisions)

Pursuant to 326 IAC 1-7-1 this rule applies to sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter are emitted. The source does not have any exhaust gas stacks with a potential to emit of twenty-five (25) tons per year or more of particulate matter. Therefore 326 IAC 1-7 does not apply.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this stationary aluminum stamping operation will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-2-4 (Emission Limitations for sources of indirect heating)

Pursuant to 326 IAC 6-2-4, particulate emissions from indirect heating facilities constructed after September 21, 1983 with a heat input less than 10 MMBTU/hour, PM emissions shall not exceed 0.60 pounds per million (MM) Btu heat input.

326 IAC 6.5-1-2 (Nonattainment Area Limitations)

326 IAC 6.5-1-2 applies to Vigo County sources not specifically listed in 326 IAC 6.5-9 that have the potential to emit one hundred (100) tons or more, or have actual emissions of ten (10) tons or more, of particulate matter per year. As the source is not specifically listed in 326 IAC 6.5-9, does not have the potential to emit one hundred (100) tons or more, and does not have actual emissions of ten (10) tons or more or particulate matter per year 326 IAC 6.5-1-2 is not applicable to this source.

Conclusion

The construction and operation of this aluminum stamping operation shall be subject to the conditions of the Exempt Construction and Operation Status, 167-22467-00106.

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

Company Name: Specialty Blanks, Inc.
Address City IN Zip: 500 S. 9th Street, Terre Haute, IN 47803
Permit Number: 167-22467-00106
Plt ID: 167-00106
Reviewer: Scott Sines
Date: 6-Mar-06

Heat Input Capacity
 MMBtu/hr
 2.46
 0.80
 5.00
 8.3

Potential Throughput
 MMCF/yr

72.4

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	0.1	0.3	0.0	3.6	0.2	3.0

*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

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler
 HAPs Emissions**

Company Name: Specialty Blanks, Inc.
Address City IN Zip: 500 S. 9th Street, Terre Haute, IN 47803
Permit Number: 167-22467-00106
Plt ID: 167-00106
Reviewer: Scott Sines
Date: 6-Mar-06

	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	7.598E-05	4.341E-05	2.713E-03	6.512E-02	1.230E-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
Potential Emission in tons/yr	1.809E-05	3.980E-05	5.065E-05	1.375E-05	7.598E-05

Methodology is the same as page 1.

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