



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 13, 2006
RE: East Coast Fasteners & Closures, Inc. / 141-22592-00552
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from 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-AM.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Mr. Cam Snodgrass
General Manager
East Coast Fasteners & Closures, Inc.
1200 Virginia Street
Walkerton, Indiana 46574

February 13, 2006

Re: 141-22592-00552
First Notice Only Change to
Registered Construction and Operation Status
141-19140-00552

Dear Mr. Snodgrass:

East Coast Fasteners & Closures, Inc. was issued a permit on August 10, 2004 for a fastener assembly and coating operation. A letter notifying the Office of Air Quality of a change in the Authorized Individual was received on February 2, 2006. Pursuant to the provisions of 326 2-5.5 the permit is hereby revised as follows:

Mr. James Lace former General Manager has been replaced by Mr. Cam Snodgrass, new General Manager for East Coast Fasteners & Closures, Inc. Mr. Snodgrass meets the requirement as an authorized individual per 326 IAC 2-1.1-1(1).

Due to a recent change in mailing address, the IDEM address has been changed to delete the P.O. Box 6015 and to change the zip code from 46206-6015 to 46204. Also the Annual Notification Form was updated to reflect the new Authorized Individual.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter to the front of the original permit.

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 Gary Freeman, at (800) 451-6027, press 0 and ask for Gary Freeman or extension 3-5334, or dial (317) 233-5334.

Sincerely,

Original signed by
Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

NLJ/gkf

cc: File – St. Joseph County
St. Joseph County Health Department
Air Compliance Section Inspector: Rick Reynolds
Permit Review Section 1- Gary Freeman
Billing, Licensing and Training Section - Chet Bohannon
IDEM Northern Regional Office



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Mr. Cam Snodgrass
General Manager
East Coast Fasteners & Closures, Inc.
1200 Virginia Street
Walkerton, Indiana 46574

February 13, 2006

Re: 141-22592-00552
First Notice Only Change to
Registered Construction and Operation Status,
141-19140-00552

Dear Mr. Snodgrass:

The application from East Coast Fasteners & Closures, Inc. received on May 7, 2004, has been reviewed. On February 3, 2006 a request was received to change the Authorized Individual. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the proposed following fastener assembly and coating operation, located at 300 Industrial Drive, Walkerton, Indiana 46574, are classified as registered:

- (a) Four (4) fastener assembly areas (identified as A-1 through A-4), constructed in December 2002 used to attach washers to screws and having a maximum combined throughput capacity of 25,000 screws per hour (265 lbs per hour). Emissions of particulate matter from the four (4) assembly areas are controlled by one (1) baghouse D-1, which exhausts at stack V-2.
- (b) One (1) paint booth (identified as PB-1), constructed in December 2002, having a maximum capacity of 25,000 screws per hour, with particulate matter emissions from the paint booth controlled by dry filters, which exhaust through stack V-4.
- (c) One (1) natural gas-fired curing oven (identified as CO-1), installed in December 2002, having a maximum heat input capacity of 0.275 MMBtu per hour and a maximum throughput capacity of 25,000 screws per hour. Emissions of VOC from the curing oven are exhausted through stack V-5.
- (d) One (1) natural gas-fired furnace (identified as F-1), used for heating the front office, having a maximum heat input capacity of 0.100 MMBtu per hour and exhausting to stack V6.
- (e) One (1) natural gas-fired furnace (identified as F-2), used for heating the break room, having a maximum heat input capacity of 0.082 MMBtu per hour and exhausting to stack V7.
- (f) Three (3) natural gas-fired radiant heaters (identified as H-1 through H-3), each having a maximum heat input capacity of 0.100 MMBtu per hour, which exhaust through stack V-1.

The following conditions shall be applicable:

- (a) 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:
- (1) 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.
 - (2) 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.
- (b) Pursuant to 326 IAC 6-3-2, the particulate from the assembly areas identified as A-1 through A-4 shall each be limited to 1.1 pounds per hour, when operating at a maximum process weight of 265 pounds per hour.

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

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

The baghouse D-1 shall be in operation at all times one or more of the assembly areas are in operation, in order to comply with this limit.

- (c) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate from the surface coating shall be controlled by a dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (d) 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 spray booth (PB-1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (c) \times U] / \sum U$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied; and

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and U is the usage rate of the coating in gallons per day.

- (e) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of paint booth PB-1 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.
- (f) Any change or modification which increases the potential VOC emissions to greater than twenty-five (25) tons per year requires prior approval from IDEM, OAQ.
- (g) The potential to emit hazardous air pollutants (HAPs) from this source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for any combination of HAPs. Therefore, 326 IAC 2-7 and of 40 CFR 63, Subpart M (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) are not applicable. Any change or modification which increases the potential emissions to greater than ten (10) tons per year for any single HAP or greater than twenty-five (25) tons per year for any combination of HAPs requires prior approval from IDEM, OAQ.
- (h) To demonstrate compliance with Condition (d) above, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition (d).
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on daily 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 solvent.
 - (3) The volume weighted average VOC content of the coatings used for each day;
 - (4) The daily cleanup solvent usage; and
 - (5) The total VOC usage for each day.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

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

Questions may be directed to Gary Freeman at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027, ask for Gary Freeman, or extension 3-5334, or dial (317) 233-5334.

Sincerely,

Original signed by
Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

NLJ/gkf

cc: File – St. Joseph County
St. Joseph County Health Department
Air Compliance – Rick Reynolds
IDEM Northern Regional Office
Permit Review Section 1 – Gary Freeman
Billing, Licensing and Training Section – Chet Bohannon

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3).

Company Name:	East Coast Fasteners & Closures, Inc.
Address:	300 Industrial Drive
City:	Walkerton, Indiana 46574
Authorized individual:	Mr. Cam Snodgrass
Phone #:	(574) 586-3117
Registration #:	141-19140-00552

I hereby certify that East Coast Fasteners & Closures, Inc., is still in operation and is in compliance with the requirements of Registration No. 141-19140-00552.

Name (typed):
Title:
Signature:
Date: