



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 8, 2008

RE: Tinnerman Palnut Engineered Products / 017-25554-00027

FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.dot12/3/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
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Mr. Michael W. Englert
Tinnerman Palnut Engineered Products, Inc., Logansport Plant
P.O. Box 660, 800 West County Road 250 South
Logansport, Indiana 46947

January 8, 2008

Re: 017-25554-00027
First Administrative Amendment to
FESOP 017-24109-00027

Dear Mr. Englert:

Tinnerman Palnut Engineered Products, Inc., Logansport Plant, was issued a Federally Enforceable State Operating Permit (FESOP) Renewal on May 18, 2007, for the operation of a metal stamping source, located at 800 West County Road 250 South, Logansport, Indiana 46947. A letter was received on November 16, 2007, requesting the following change to the permit:

The Permittee requests the existing FESOP be amended to extend their permit term from five (5) to ten (10) years per 326 IAC 2-1.1-9 and 326 IAC 2-8-4. The source is also requesting to add several new emission units, which are listed in the attached TSD.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Jason Renzaglia, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7893 to speak directly to Mr. Renzaglia. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Original signed by,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments

ERG/JR

cc: File - Cass County
U.S. EPA, Region V
Cass County Health Department
Air Compliance Section Inspector
Compliance Data Section
Administrative and Development
Technical Support and Modeling
Billing, Licensing and Training Section



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Tinnerman Palnut Engineered Products, Inc., Logansport Plant
800 West County Road 250 South
Logansport, Indiana 46947**

(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.

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.: F017-24109-00027	
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 18, 2007 Expiration Date: May 18, 2017
First Administrative Amendment No. 017-25554-00027	
Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 8, 2008 Expiration Date: May 18, 2017

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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 2-8-3(b)]

The Permittee owns and operates a stationary metal stamping source including electroplating operations, surface coating operations, and heat treating of metal parts.

Source Address:	800 West County Road 250 South, Logansport, Indiana 46947
Mailing Address:	P.O. Box 660, 800 West County Road 250 South, Logansport, IN 46947
General Source Phone Number:	(574) 722-5168
SIC Code:	3469, 3471, 3479, 3398, 3714, and 3499
County Location:	Cass
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD 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)]

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

- (a) One (1) metal part surface coating operation, identified as EU-1, consisting of three (3) metal part dip spin surface coating lines, identified as Lines No. 1, No. 2, and No. 3, and cleaning operations, using three (3) dip tanks, each coating a maximum of 6000 pounds of metal parts per hour, each exhausting through one (1) stack, identified as S1A-D, S2A-D, and S3A-D. Line No. 1 and Line No. 2 were constructed in 1989 and Line No. 3 was constructed in 1985.
- (b) Three (3) wheelabrator abrasive tumble blasting units, identified as EU-6a, EU-6b, and EU-6c, each with a maximum process weight rate of 2100 pounds per hour, equipped with a common cartridge type dust collector with a design outlet grain loading of 0.03 grains per actual standard cubic feet, with a maximum air flow rate of 4500 actual cubic feet per minute (acfm). The wheelabrators were constructed in 2002.
- (c) One (1) metal part dip spin surface coating line, approved for construction in 2008, with a maximum capacity of 1.0 gallons of coating per hour, identified as EU-10, and consisting of the following:
 - (1) One (1) dip spin coating stage, exhausting through one (1) stack, identified as S10A;
 - (2) One (1) pre-cure stage, exhausting through one (1) stack, identified as S10B;
 - (3) One (1) curing stage, exhausting through one (1) stack, identified as S10C; and
 - (4) One (1) cooling stage, exhausting through one (1) stack, identified as S10D.

A.3 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:

- (a) One (1) zinc electroplating process, consisting of two (2) acid zinc electroplating lines, and two (2) zinc phosphate coating lines, emitting less than 5 pounds per day of hydrochloric acid gas emissions from metal cleaning operation, controlled by two (2) acid scrubbers, each with a gas flow rate of 23,300 acfm. The zinc electroplating operation was constructed in 1995.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months:
 - (1) three (3) Safety Kleen sinks for parts washing.
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4,000 actual cubic feet per minute (acfm), including the following:
 - (1) one (1) tool grinding operation, identified as EU-2, with a maximum process weight rate of 43.2 pounds per hour, with particulate matter emissions controlled by two (2) baghouses. The tool grinding operation was constructed in 1987;
 - (2) one (1) grinding operation, identified as EU-8, utilizing glass bead media, with a maximum process weight rate of 19.5 pounds per hour, with particulate matter emissions controlled by one (1) tube filter. The glass bead grinding operation was constructed in 1987.
- (d) One (1) natural gas-fired heat treat/carburizing furnace, identified as EU-3, using methanol to produce a carbon monoxide and hydrogen rich atmosphere, equipped with twelve (12) natural-gas fired tube burners, each with a maximum heat input capacity of 0.6 MMBtu per hour, and one (1) integrally designed open flame exit burner, which combusts carbon monoxide with a 98% control efficiency, emitting less than 25 pounds per day of carbon monoxide. The heat treat/carburizing furnace was constructed in 1990. The tube burners were constructed in 1991.
- (e) One (1) natural gas-fired heat treat/carburizing furnace, approved for construction in 2008, identified as EU-11, using methanol to produce a carbon monoxide and hydrogen rich atmosphere, equipped with one (1) natural-gas fired oven hardening furnace unit with a maximum heat input capacity of 1.08 MMBtu per hour, one (1) natural-gas fired oven molten salt tank burner with a maximum heat input capacity of 0.73 MMBtu per hour, and one (1) integrally designed open flame exit burner, which combusts carbon monoxide with a 98% control efficiency, emitting less than 25 pounds per day of carbon monoxide.
- (f) One (1) corrosion inhibitor dip coating unit, identified as EU-9, using a solvent based inhibitor, with a maximum throughput of 1,666 parts per hour. The inhibitor dip coating unit was constructed in 2006.
- (g) One (1) natural gas-fired boiler for plating operations, with a maximum heat input capacity of 9.734 MMBtu per hour. The boiler was constructed in 1995. [326 IAC 6-2-4]
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) pre-cure oven on coating Line No. 1, with a maximum heat input capacity

of 2.0 million British thermal units (MMBtu) per hour. The precure oven was constructed in 1989;

- (2) one (1) cure oven on coating Line No. 1, with a maximum heat input capacity of 3.0 MMBtu per hour. The cure oven was constructed in 1989;
 - (3) one (1) precure oven on coating Line No. 2, with a maximum heat input capacity of 2.0 MMBtu per hour. The precure oven was constructed in 1989;
 - (4) one (1) cure oven on coating Line No. 2, with a maximum heat input capacity of 3.0 MMBtu per hour. The cure oven was constructed in 1989;
 - (5) one (1) precure oven on coating Line No. 3, with a maximum heat input capacity of 0.5 million British thermal units (MMBtu) per hour. The precure oven was constructed in 1985;
 - (6) one (1) cure oven on coating Line No. 3, with a maximum heat input capacity of 2.0 MMBtu per hour. The cure oven was constructed in 1985;
 - (7) main building space heating, utilizing natural gas-fired units with a total heat input capacity of 9.0 MMBtu per hour. The space heating was constructed in 1985;
 - (8) coating building space heating, utilizing natural gas-fired units with a total heat input capacity of 7.13 MMBtu per hour. The coating building space heating was constructed in 1989;
 - (9) One (1) spin drying oven on coating Line No. 4, approved for construction in 2008, with a maximum heat input capacity of 1.5 million British thermal units (MMBtu) per hour.
 - (10) Two (2) aqueous mechanical plating drying ovens, approved for construction in 2008, each with a maximum heat input capacity of 0.18 million British thermal units (MMBtu) per hour.
- (i) Combustion source flame safety purging on startup.
 - (j) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
 - (k) Refractory storage not requiring air pollution control equipment.
 - (l) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
 - (m) Machining where an aqueous cutting coolant continuously floods the machining interface.
 - (n) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees Celsius (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees Celsius (68°F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (o) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.
- (p) Closed loop heating and cooling systems.
- (q) Rolling oil recovery systems.
- (r) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (s) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (t) Noncontact cooling tower systems with forced and induced draft cooling tower systems not regulated under a NESHAP.
- (u) Quenching operations used with heat treating processes.
- (v) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (w) Paved and unpaved roads and parking lots with public access.
- (x) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.
- (y) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (z) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (aa) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (bb) One (1) natural-fired emergency generator, installed prior to July 15, 2005, with a maximum capacity of 20.1 horsepower. There have not been any modifications to the generator since installation.
- (cc) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (dd) Farm operations.
- (ee) One (1) vinyl dip coating unit, identified as EU-7, using water-based primer and plastisol coatings, with a maximum throughput of 2,000 units per hour, equipped with one (1) natural gas-fired dryer, rated at 1 MMBtu per hour, and one (1) natural gas-fired infrared heater, rated at 0.5 MMBtu per hour. The vinyl dip coating unit was constructed in 2001.

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

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) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

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

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)]

- (a) This permit, F017-24109-00027, is issued for a fixed term of ten (10) 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]

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]

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)]

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)]

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)]

- (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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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)]

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)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (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]

- (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 F017-24109-00027 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 quarterly according to Section C - General Reporting Requirements 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)]

- (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]

- (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]

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]

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]

- (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 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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]

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]

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]

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]

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]

- (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]

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

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)]

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]

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)]

-
- (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]

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]

- (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) 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.
- (f) If the Permittee is a member of IDEM's Environmental Stewardship Program (ESP), the Permittee may report in the manner below for any reporting requirement except Section B - Deviations from Permit Requirements, that allows reporting per this paragraph:
 - (1) Each report shall be submitted semi-annually, covering the period from April 1 to September 30 or October 1 to March 31.
 - (2) Each report, 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.
 - (3) Each report 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).
 - (4) The Permittee shall use the attached Environmental Stewardship Program Reporting Forms or their equivalent.
 - (5) Each report shall be submitted to the address listed in paragraph (b) of this condition.

If the Permittee is removed from or withdraws from the ESP, the Permittee shall begin quarterly reporting according to paragraphs (a) through (e) of this condition and the condition(s) requiring the reporting. If the Permittee is removed from or withdraws from the ESP during the second quarter of a semi-annual period, the Permittee shall submit all reports for the first quarter of the period within thirty (30) days of the removal or withdrawal.

Stratospheric Ozone Protection

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

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 [326 IAC 2-8-4(10)]:

- (a) One (1) metal part surface coating operation, identified as EU-1, consisting of three (3) metal part dip spin surface coating lines, identified as Lines No. 1, No. 2, and No. 3, and cleaning operations, using three (3) dip tanks, each coating a maximum of 6000 pounds of metal parts per hour, each exhausting through one (1) stack, identified as S1A-D, S2A-D, and S3A-D. Line No. 1 and Line No. 2 were constructed in 1989 and Line No. 3 was constructed in 1985.
- (c) One (1) metal part dip spin surface coating line, approved for construction in 2008, with a maximum capacity of 1.0 gallons of coating per hour, identified as EU-10, and consisting of the following:
 - (1) One (1) dip spin coating stage, exhausting through one (1) stack, identified as S10A;
 - (2) One (1) pre-cure stage, exhausting through one (1) stack, identified as S10B;
 - (3) One (1) curing stage, exhausting through one (1) stack, identified as S10C; and
 - (4) One (1) cooling stage, exhausting through one (1) stack, identified as S10D.

(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 VOC and HAP Limits [326 IAC 2-8] [326 IAC 2-4.1] [326 IAC 2-2] [326 IAC 8-2-9][326 IAC 8-1-6]

- (a) The total combined VOC input to the metal part surface coating operation (EU-1), including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit, in combination with the potential emissions from insignificant activities, will keep the total VOC emissions from the source to less than 100 tons per year and will render 326 IAC 2-7 (Part 70), 326 IAC 8-2-9 (Miscellaneous Metal Coating), 326 IAC 8-1-6 (BACT), and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the facility.
- (b) The total combined input of any single HAP to the metal part surface coating operation (EU-1), including coatings, dilution solvents, and cleaning solvents, together with the potential emissions from insignificant activities, shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit renders 326 IAC 2-7 (Part 70) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) not applicable to the source.
- (c) The total input of combined HAPs to the metal part surface coating operation (EU-1), including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 23 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit, in combination with the potential emissions from insignificant activities, will keep the total combined HAP emissions from the source to less than 25 tons per year and will render 326 IAC 2-7 (Part 70) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) not applicable to the source.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(d)(3) (Miscellaneous Metal Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon excluding water from the Dip Spin Line #4 (EU-10).

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the metal part surface coating operation, identified as EU-1.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. 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 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAP content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on a 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 and HAP usage for each month; and
- (4) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

If the Permittee is a member of IDEM's Environmental Stewardship Program (ESP) program, the Permittee may, submit reports summarizing the information to document compliance with Condition D.1.1 according to the provisions of paragraph (f) of Section C - General Reporting Requirements.

Otherwise, a quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty

(30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) Three (3) wheelabrator abrasive tumble blasting units, identified as EU-6a, EU-6b, and EU-6c, each with a maximum process weight rate of 2100 pounds per hour, equipped with a common cartridge type dust collector with a design outlet grain loading of 0.03 grains per actual standard cubic feet, with a maximum air flow rate of 4500 actual cubic feet per minute (acfm). The wheelabrators were constructed in 2002.

Insignificant Activities:

- (a) One (1) zinc electroplating process, consisting of two (2) acid zinc electroplating lines, and two (2) zinc phosphate coating lines, emitting less than 5 pounds per day of hydrochloric acid gas emissions from metal cleaning operation, controlled by two (2) acid scrubbers, each with a gas flow rate of 23,300 acfm. The zinc electroplating operation was constructed in 1995.

(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 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the three wheelabrators, identified as EU-6a, EU-6b, and EU-6c, shall not exceed 4.24 pounds per hour each when operating at a process weight rate of 2,100 pounds per hour each. The pounds per hour limitation was calculated using 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.2.2 PSD Minor Limit [326 IAC 2-2]

- (a) The combined particulate matter (PM/PM-10) emissions from the three wheelabrators, identified as EU-6a, EU-6b, and EU-6c, shall be less than 12.71 pounds per hour.

- (b) The amperage to the zinc electroplating tanks shall not exceed 12,000 amps.

Compliance with these PM and PM-10 limits and the limits in Condition D.3.2, in combination with the potential emissions of PM/PM-10 from insignificant activities, will render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.2.3 PM-10 [326 IAC 2-8]

- (a) The combined PM-10 emissions from the three wheelabrators, identified as EU-6a, EU-6b, and EU-6c, shall be less than 12.71 pounds per hour.

- (b) The amperage to the zinc electroplating tanks shall not exceed 12,000 amps.

Compliance with this PM-10 limit and the limit in Condition D.3.3, in combination with the potential emissions of PM-10 from insignificant activities, will satisfy the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements 326 IAC 2-7 (Part 70) not applicable.

D.2.4 Particulate Control (PM and PM-10)

In order to comply with Conditions D.2.1, D.2.2, and D.2.3 the cartridge type dust collector for particulate control shall be in operation and control emissions from the wheelabrators at all times that any one of the three wheelabrators are in operation.

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the three wheelabrators, identified as EU-6a, EU-6b, and EU-6c and their control devices.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities:

- (b) Degreasing operations that do not exceed 145 gallons per 12 months:
 - (1) three (3) Safety Kleen sinks for parts washing.
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4,000 actual cubic feet per minute (acfm), including the following:
 - (1) one (1) tool grinding operation, identified as EU-2, with a maximum process weight rate of 43.2 pounds per hour, with particulate matter emissions controlled by two (2) baghouses. The tool grinding operation was constructed in 1987;
 - (2) one (1) grinding operation, identified as EU-8, utilizing glass bead media, with a maximum process weight rate of 19.5 pounds per hour, with particulate matter emissions controlled by one (1) tube filter. The glass bead grinding operation was constructed in 1987.
- (d) One (1) natural gas-fired heat treat/carburizing furnace, identified as EU-3, using methanol to produce a carbon monoxide and hydrogen rich atmosphere, equipped with twelve (12) natural-gas fired tube burners, each with a maximum heat input capacity of 0.6 MMBtu per hour, and one (1) integrally designed open flame exit burner, which combusts carbon monoxide with a 98% control efficiency, emitting less than 25 pounds per day of carbon monoxide. The heat treat/carburizing furnace was constructed in 1990.
- (e) One (1) natural gas-fired heat treat/carburizing furnace, approved for construction in 2008, identified as EU-11, using methanol to produce a carbon monoxide and hydrogen rich atmosphere, equipped with one (1) natural-gas fired oven hardening furnace unit with a maximum heat input capacity of 1.08 MMBtu per hour, one (1) natural-gas fired oven molten salt tank burner with a maximum heat input capacity of 0.73 MMBtu per hour, and one (1) integrally designed open flame exit burner, which combusts carbon monoxide with a 98% control efficiency, emitting less than 25 pounds per day of carbon monoxide.
- (f) One (1) corrosion inhibitor dip coating unit, identified as EU-9, using a solvent based inhibitor, with a maximum throughput of 1,666 parts per hour. The inhibitor dip coating unit was constructed in 2006.

(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 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;

- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 PSD Minor Limit [326 IAC 2-2]

Particulate matter (PM/PM-10) emissions from the grinding operations, identified as EU-2 and EU-8, shall each not exceed 0.551 pounds of PM/PM-10 per hour.

Compliance with these PM and PM-10 limits and the PM/PM-10 limits in Condition D.2.2, in combination with the potential emissions of PM/PM-10 from insignificant activities, will keep PM and PM-10 emissions from the source to less than 250 and 100 tons per year, respectively, and will render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.3.3 PM-10 [326 IAC 2-8]

The PM-10 emissions from the grinding operations, identified as EU-2 and EU-8, shall each not exceed 0.551 pounds per hour.

Compliance with this PM-10 limit and the PM-10 limit in Condition D.2.3, in combination with the potential emissions of PM-10 from insignificant activities, will keep PM-10 emissions from the source to less than 100 tons per year and will render the requirements 326 IAC 2-7(Part 70) not applicable.

D.3.4 Particulate Control (PM and PM-10)

- (a) In order to comply with Conditions D.3.2 and D.3.3, the two (2) baghouses for particulate control shall be in operation and control emissions from the tool grinding operation (EU-2) at all times that EU-2 is in use.
- (b) In order to comply with Conditions D.3.2 and D.3.3, the one (1) tube filter for particulate control shall be in operation and control emissions from the glass bead grinding operation (EU-8) at all times that EU-8 is in use.

D.3.5 Carbon Monoxide (CO) Control

- (a) The one (1) open flame burner for carbon monoxide (CO) control associated with EU-3 shall be in operation and control emissions from the heat treat/carburizing furnace (EU-3) at all times that the furnace is in use.
- (b) The one (1) open flame burner for carbon monoxide (CO) control associated with EU-11 shall be in operation and control emissions from the heat treat/carburizing furnace (EU-11) at all times that the furnace is in use.

D.3.6 Volatile Organic Compound (VOC) Limitation [326 IAC 8-2-9]

The usage of VOCs in the corrosion inhibitor dip coating unit, identified as EU-9, including coatings, dilution solvents, and clean-up solvents, shall be limited to less than fifteen (15) pounds per day, with compliance determined at the end of each day.

This limit is required to limit emissions of VOCs from the one corrosion inhibitor dip coating unit to less than fifteen (15) pounds per day. Compliance with this VOC limit shall render 326 IAC 8-2-9

(Miscellaneous Metal Coating) not applicable.

Compliance Determination Requirements

D.3.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitations contained in Condition D.3.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, 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.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage/emission limitation established in Condition D.3.6.
 - (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; and
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The daily cleanup solvent usage; and
 - (4) The total VOC usage for each day.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

If the Permittee is a member of IDEM's Environmental Stewardship Program (ESP) program, the Permittee may, submit reports summarizing the information to document compliance with Condition D.3.6 according to the provisions of paragraph (f) of Section C - General Reporting Requirements.

Otherwise, a quarterly summary of the information to document compliance with Condition D.3.6 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities:

- (f) One (1) natural gas-fired boiler for plating operations, with a maximum heat input capacity of 9.734 MMBtu per hour. The boiler was constructed in 1995. [326 IAC 6-2-4]

(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 2-8-4(1)]

D.4.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 9.734 MMBtu per hour heat input boiler shall not exceed 0.6 pounds per MMBtu heat input.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

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

Source Name: Tinnerman Palnut Engineered Products, Inc., Logansport Plant
Source Address: 800 West County Road 250 South, Logansport, IN 46947
Mailing Address: P.O. Box 660, 800 West County Road 250 South, Logansport, IN 46947
FESOP Permit No.: F017-24109-00027

**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: Tinnerman Palnut Engineered Products, Inc., Logansport Plant
Source Address: 800 West County Road 250 South, Logansport, IN 46947
Mailing Address: P.O. Box 660, 800 West County Road 250 South, Logansport, IN 46947
FESOP Permit No.: F017-24109-00027

This form consists of 2 pages

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- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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• 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 |
|--|

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 ₂ , VOC, NO _x , 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 Usage Report

Source Name: Tinnerman Palnut Engineered Products, Inc., Logansport Plant
Source Address: 800 West County Road 250 South, Logansport, IN 46947
Mailing Address: P.O. Box 660, 800 West County Road 250 South, Logansport, IN 46947
FESOP Permit No.: F017-24109-00027
Facility: One (1) corrosion inhibitor dip coating unit (EU-9)
Parameter: VOC Usage
Limit: The usage of VOCs in the corrosion inhibitor dip coating unit, including coatings, dilution solvents, and clean-up solvents, shall be limited to less than fifteen (15) pounds per day, with compliance determined at the end of each day.

Month: _____ Year: _____

Day	VOC Usage	Day	VOC Usage
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**

FESOP ESP Semi Annual Report

Source Name: Tinnerman Palnut Engineered Products, Inc., Logansport Plant
Source Address: 800 West County Road 250 South, Logansport, IN 46947
Mailing Address: P.O. Box 660, 800 West County Road 250 South, Logansport, IN 46947
FESOP Permit No.: F017-24109-00027
Facility: Metal parts surface coating operation (EU-1) consisting of three (3) dip spin lines (No. 1, No. 2, and No. 3)

Parameter: Single HAP usage
Limit a: The total combined input of any single HAP to the three (3) dip spin coating lines, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Parameter: Total HAP usage
Limit b: The total input of combined HAPs to the three (3) dip spin coating lines, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 23 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Parameter: VOC usage
Limit c: The total combined VOC input to the three (3) dip spin coating lines, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1a	Column 1b	Column 1c	Column 2a	Column 2b	Column 2c	Column 1a + 2a	Column 1b + 2b	Column 1c + 2c
	Single HAP Usage This Month	Total HAP Usage This Month	VOC Usage This Month	Single HAP Usage Previous 11 Months	Total HAP Usage Previous 11 Months	VOC Usage Previous 11 Months	Single HAP Usage 12 Month Total	Total HAP Usage 12 Month Total	VOC Usage 12 Month Total
Month 1									
Month 2									
Month 3									
Month 4									
Month 5									
Month 6									

☐ No deviation occurred in this period. ☐ Deviation/s occurred in this period.

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: Tinnerman Palnut Engineered Products, Inc., Logansport Plant
Source Address: 800 West County Road 250 South, Logansport, IN 46947
Mailing Address: P.O. Box 660, 800 West County Road 250 South, Logansport, IN 46947
FESOP Permit No.: F017-24109-00027

Months: _____ to _____ Year: _____

Page 1 of 2

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 ANo deviations occurred this reporting period@.

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name: Tinnerman Palnut Engineered Products, Inc., Logansport Plant
Source Location: 800 West County Road 250 South
County: Cass
SIC Code: 3469, 3471, 3479, 3398, 3714, and 3499
Operation Permit No.: 017-24109-00027
Operation Permit Issuance Date: May 18, 2007
Administrative Amendment No.: 017-25554-00027
Permit Reviewer: ERG/JR

The Office of Air Quality (OAQ) has reviewed a revision application from Tinnerman Palnut Engineered Products, Inc., Logansport Plant (Tinnerman), relating related to a modification to an existing metal stamping source.

History

Tinnerman is a metal stamping facility that includes electroplating operations, surface coating operations, and heat treating of metal parts; and is permitted to operate under FESOP No. 017-24109-00027, issued on May 18, 2007. On November 16, 2007, Tinnerman submitted a letter to IDEM, OAQ requesting to add a dip spin coating line, heat treating and carburizing furnace, an aqueous mechanical plating line, and some insignificant activities of natural gas combustion.

County Attainment Status

The source is located in Cass County.

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

- (a) Cass 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 a surrogate for PM2.5 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. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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.

- (c) Cass 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 in 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.

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	59.16
PM10	60.33
SO ₂	0.13
VOC	31.10
CO	17.31
NO _x	20.61

- (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 in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based on FESOP No. 017-24109-00027, issued on May 18, 2007.

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

HAPs	Potential To Emit (tons/year)
Single HAP	<10
Total Combined HAP	<25

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAPs emissions are limited to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed a letter that was submitted by Tinnerman Palnut Engineered Products, Inc., Logansport Plant on November 16, 2007, relating to the construction of a new dip spin coating line, heat treating and carburizing furnace, aqueous mechanical plating line, and some insignificant activities of natural gas combustion. The source is requesting to extend their permit term from five (5) to ten (10) years per 326 IAC 2-1.1-9 and 326 IAC 2-8-4. The source is also requesting to add the following emission units to their permit:

- (a) One (1) metal part dip spin surface coating line, approved for construction in 2008, with a maximum capacity of 1.0 gallons of coating per hour, identified as EU-10, and consisting of the following:
 - (1) One (1) dip spin coating stage, exhausting through one (1) stack, identified as S10A;
 - (2) One (1) pre-cure stage, exhausting through one (1) stack, identified as S10B;
 - (3) One (1) curing stage, exhausting through one (1) stack, identified as S10C; and
 - (4) One (1) cooling stage, exhausting through one (1) stack, identified as S10D.
- (b) One (1) natural gas-fired heat treat/carburizing furnace, approved for construction in 2008, identified as EU-11, using methanol to produce a carbon monoxide and hydrogen rich atmosphere, equipped with one (1) natural-gas fired oven hardening furnace unit with a maximum heat input capacity of 1.08 MMBtu per hour, one (1) natural-gas fired oven molten salt tank burner with a maximum heat input capacity of 0.73 MMBtu per hour, and one (1) integrally designed open flame exit burner, which combusts carbon monoxide with a 98% control efficiency, emitting less than 25 pounds per day of carbon monoxide.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) spin drying oven on coating Line No. 4, approved for construction in 2008, with a maximum heat input capacity of 1.5 million British thermal units (MMBtu) per hour.
 - (2) Two (2) aqueous mechanical plating drying ovens, approved for construction in 2008, each with a maximum heat input capacity of 0.18 million British thermal units (MMBtu) per hour.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S10A	dip spin coating stage	28	1	1800	Ambient
S10B	pre-cure stage	32	1.17 x 0.8	700	700
S10C	curing stage	32	1.17 x 0.8	700	700
S10D	cooling stage	32	3	18000	Ambient
S11A	heat treat/carburizing furnace	28	1.33	0	1500
S12A	mechanical plating drying oven #1	28	1.33	600	250
S12B	mechanical plating drying oven #2	28	1.33	600	250

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1-4).

Permit Level Determination – FESOP Revision

Pursuant to 326 IAC 2-7-1(29), 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 2-8.11.1. This table reflects the PTE before controls of the revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	PTE of revision (tons/year)
PM	0.03
PM10	0.12
SO ₂	0.01
VOC	5.04
CO	4.53
NO _x	1.64
HAPs	0.03

Pursuant to 326 IAC 2-8-10(a), this revision is being performed as an Administrative Amendment because the potential to emit for this modification is less than minor permit revision thresholds pursuant to 326 IAC 2-8-11.1(d)(4), and the modification does not meet any of the significant permit revision criteria pursuant to 326 IAC 2-8-11.1(f)(1).

Permit Level Determination – FESOP

The table below summarizes the potential to emit, reflecting all limits, of the entire source. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, 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 of the Entire Source After Issuance of this Revision (tons/year)							
	PM	PM10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Surface Coating Operations - Corrosion Inhibitor	0.00	0.00	0.00	3.67	0.00	0.00	0.00	0.00
Surface Coating Operations- Dip Spin Coating Lines No. 1, 2, and 3 and cleaning operations	0.00	0.00	0.00	< 25 ⁽²⁾	0.00	0.00	< 10	23
Surface Coating Operations- EU-7b	0.00	0.00	0.00	1.14	0.00	0.00	0.00	0.00
Three Wheelabrators	55.66 ⁽³⁾	55.66 ⁽³⁾	0.00	0.00	0.00	0.00	0.00	0.00
Grinding Operations	2.41 ⁽³⁾	2.41 ⁽³⁾	0.00	0.00	0.00	0.00	0.00	0.00
Zinc Electroplating	0.48 ⁽¹⁾	0.48 ⁽¹⁾	0.00	0.16	0.00	0.00	0.16	0.16
Natural Gas Boiler	0.08	0.32	0.03	0.23	3.58	4.26	0.08	0.08
Natural Gas Combustion and Heat Treat Furnace	0.31	1.24	0.10	0.90	13.73	16.35	0.31	0.29
Emergency Generator	Negl.	Negl.	Negl.	Negl.	0.003	0.003	Negl.	Negl.
Welding Operations	0.22	0.22	0.00	0.00	0.00	0.00	0.02	0.02
New Dip Spin Line #4 (EU-10)	0.00	0.00	0.00	4.95	0.00	0.00	0.00	0.00

Process/emission unit	Potential To Emit of the Entire Source After Issuance of this Revision (tons/year)							
	PM	PM10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
New Heat Treat Furnace #2 (EU-11)	0.02	0.06	4.85E-3	0.04	3.83	0.81	Negl.	0.02
New Insignificant Combustion	1.58E-2	6.32E-2	4.99E-3	4.57E-2	0.70	0.83	Negl.	1.57E-2
Total PTE of the Entire Source	59.16 59.2	60.33 60.45	0.13 0.14	31.40 36.1	17.31 21.8	20.61 22.3	< 10	< 25
Title V Thresholds	NA	100	100	100	100	100	< 10	< 25
PSD Major Levels	250	250	250	250	250	250	NA	NA

⁽¹⁾ Controlled emissions.

⁽²⁾ Limited emissions in order to render 326 IAC 8-2-9 (Miscellaneous Metal Coating), 326 IAC 8-1-6 (BACT), and 326 IAC 2-7 (Part 70) not applicable.

⁽³⁾ Emissions of PM are limited in order to comply with 326 IAC 6-3-2 (Particulate Matter Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (PSD). Emissions of PM-10 are limited in order to comply with 326 IAC 2-8-4 (FESOP) and 326 IAC 2-2 (PSD).

- (a) 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.
- (b) After this modification, this source is still a minor source pursuant to the Part 70 Permit program.

Federal Rule Applicability Determination

- (a) There are no NSPSs (326 IAC 12 and 40 CFR 60) included in this administrative amendment.
- (b) There are no NESHAPs (326 IAC 14, 326 IAC 20, and 40 CFR 63) included in this administrative amendment.

State Rule Applicability Determination - Revision

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

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination.

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

After this proposed revision, the entire source will have a potential to emit of less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

The requirements of 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes - Surface Coating) are not applicable to the new Dip Spin Line #4 (EU-10) because EU-10 uses a dip coating application method, which have no particulate emissions or minimal emissions of particulate.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The provisions of 326 IAC 7-1.1-1 do not apply to the new Heat Treat Furnace #2 (EU-11) or the insignificant combustion equipment because these emission units do not have potential sulfur dioxide emissions greater than 25 tons per year or 10 pounds per hour.

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

The new Dip Spin Line #4 (EU-10) is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because the emission unit will be constructed after July 1, 1990 and has actual volatile organic compound (VOC) emission of greater than fifteen (15) pounds per day before add-on controls.

Pursuant to 326 IAC 8-2-9(d)(3), the volatile organic compound (VOC) content of coating delivered to the applicator at the Dip Spin Line #4 (EU-10) shall be limited to 3.5 pounds of VOCs per gallon of coating less water because this operation applies extreme performance coatings.

Based on the MSDS submitted by the source and calculations made, the Dip Spin Line #4 (EU-10) is in compliance with this requirement. See page one (1) of four (4) of TSD, Appendix A.

Compliance Determination and Monitoring Requirements

There are no compliance monitoring requirements applicable to this modification.

Proposed Changes

The following changes have been made to the permit. Language with a line through it has been deleted, and bold language has been added. The Table of Contents has been updated as necessary.

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Tinnerman Palnut Engineered Products, Inc., Logansport Plant
800 West County Road 250 South
Logansport, Indiana 46947**

...

Operation Permit No.: F017-24109-00027	
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 18, 2007 Expiration Date: May 18, 201742
First Administrative Amendment No. 017-25554-00027	
Issued by: Iryn Calilung, Section Chief Matt Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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

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

...

- (c) **One (1) metal part dip spin surface coating line, approved for construction in 2008, with a maximum capacity of 1.0 gallons of coating per hour, identified as EU-10, and consisting of the following:**
- (1) **One (1) dip spin coating stage, exhausting through one (1) stack, identified as S10A;**
 - (2) **One (1) pre-cure stage, exhausting through one (1) stack, identified as S10B;**
 - (3) **One (1) curing stage, exhausting through one (1) stack, identified as S10C; and**
 - (4) **One (1) cooling stage, exhausting through one (1) stack, identified as S10D.**

A.3 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:

...

- (e) **One (1) natural gas-fired heat treat/carburizing furnace, approved for construction in 2008, identified as EU-11, using methanol to produce a carbon monoxide and hydrogen rich atmosphere, equipped with one (1) natural-gas fired oven hardening furnace unit with a maximum heat input capacity of 1.08 MMBtu per hour, one (1) natural-gas fired oven molten salt tank burner with a maximum heat input capacity of 0.73 MMBtu per hour, and one (1) integrally designed open flame exit burner, which combusts carbon monoxide with a 98% control efficiency, emitting less than 25 pounds per day of carbon monoxide.**

- ~~(e)~~(f) One (1) corrosion inhibitor dip coating unit, identified as EU-9, using a solvent based inhibitor, with a maximum throughput of 1,666 parts per hour. The inhibitor dip coating unit was constructed in 2006.

- ~~(f)~~(g) One (1) natural gas-fired boiler for plating operations, with a maximum heat input capacity of 9.734 MMBtu per hour. The boiler was constructed in 1995. [326 IAC 6-2-4]

- ~~(g)~~(h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

...

- (9) **One (1) spin drying oven on coating Line No. 4, approved for construction in 2008, with a maximum heat input capacity of 1.5 million British thermal units (MMBtu) per hour.**

- (10) **Two (2) aqueous mechanical plating drying ovens, approved for construction in 2008, each with a maximum heat input capacity of 0.18 million British thermal units (MMBtu) per hour.**

- ~~(h)~~(i) Combustion source flame safety purging on startup.

- ~~(i)~~(j) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

- ~~(j)~~(k) Refractory storage not requiring air pollution control equipment.

- ~~(k)~~(l) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

- ~~(l)~~(m) Machining where an aqueous cutting coolant continuously floods the machining interface.

~~(m)~~(n) Cleaners and solvents characterized as follows:

- (1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees Celsius (100°F) or;
- (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees Celsius (68°F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

~~(n)~~(o) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

~~(o)~~(p) Closed loop heating and cooling systems.

~~(p)~~(q) Rolling oil recovery systems.

~~(q)~~(r) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

~~(r)~~(s) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

~~(s)~~(t) Noncontact cooling tower systems with forced and induced draft cooling tower systems not regulated under a NESHAP.

~~(t)~~(u) Quenching operations used with heat treating processes.

~~(u)~~(v) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

~~(v)~~(w) Paved and unpaved roads and parking lots with public access.

~~(w)~~(x) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.

~~(x)~~(y) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

~~(y)~~(z) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

~~(z)~~(aa) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

~~(aa)~~(bb) One (1) natural-fired emergency generator, installed prior to July 15, 2005, with a maximum capacity of 20.1 horsepower. There have not been any modifications to the generator since installation.

~~(bb)~~(cc) A laboratory as defined in 326 IAC 2-7-1(21)(D).

~~(cc)~~(dd) Farm operations.

~~(dd)~~(ee) One (1) vinyl dip coating unit, identified as EU-7, using water-based primer and plastisol coatings, with a maximum throughput of 2,000 units per hour, equipped with one (1)

natural gas-fired dryer, rated at 1 MMBtu per hour, and one (1) natural gas-fired infrared heater, rated at 0.5 MMBtu per hour. The vinyl dip coating unit was constructed in 2001.

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

- (a) This permit, F017-24109-00027, is issued for a fixed term of ~~five (5)~~ **ten (10)** 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.

...

SECTION D.1 FACILITY OPERATION CONDITIONS

...

- (c) **One (1) metal part dip spin surface coating line, approved for construction in 2008, with a maximum capacity of 1.0 gallons of coating per hour, identified as EU-10, and consisting of the following:**

- (1) **One (1) dip spin coating stage, exhausting through one (1) stack, identified as S10A;**
- (2) **One (1) pre-cure stage, exhausting through one (1) stack, identified as S10B;**
- (3) **One (1) curing stage, exhausting through one (1) stack, identified as S10C; and**
- (4) **One (1) cooling stage, exhausting through one (1) stack, identified as S10D.**

...

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

...

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(d)(3) (Miscellaneous Metal Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon excluding water from the Dip Spin Line #4 (EU-10).

~~D.1.2~~D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

...

Compliance Determination Requirements

~~D.1.3~~D.1.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations contained in Conditions **D.1.1 and D.1.2** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. 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 2-8-4(3)] [326 IAC 2-8-16]

~~D.1.4~~D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions **D.1.1 and D.1.2**, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in

Conditions **D.1.1 and D.1.2.** Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

~~D.1.5~~**D.1.6** Reporting Requirements

...

SECTION D.3 FACILITY OPERATION CONDITIONS

...

- (e) **One (1) natural gas-fired heat treat/carburizing furnace, approved for construction in 2008, identified as EU-11, using methanol to produce a carbon monoxide and hydrogen rich atmosphere, equipped with one (1) natural-gas fired oven hardening furnace unit with a maximum heat input capacity of 1.08 MMBtu per hour, one (1) natural-gas fired oven molten salt tank burner with a maximum heat input capacity of 0.73 MMBtu per hour, and one (1) integrally designed open flame exit burner, which combusts carbon monoxide with a 98% control efficiency, emitting less than 25 pounds per day of carbon monoxide.**
- ~~(e)~~(f) One (1) corrosion inhibitor dip coating unit, identified as EU-9, using a solvent based inhibitor, with a maximum throughput of 1,666 parts per hour. The inhibitor dip coating unit was constructed in 2006.

...

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

...

D.3.5 Carbon Monoxide (CO) Control

- (a) The one (1) open flame burner for carbon monoxide (CO) control **associated with EU-3** shall be in operation and control emissions from the heat treat/carburizing furnace (EU-3) at all times that the furnace is in use.
- (b) The one (1) open flame burner for carbon monoxide (CO) control **associated with EU-11** shall be in operation and control emissions from the heat treat/carburizing furnace (EU-11) at all times that the furnace is in use.

Conclusion

This modification shall be subject to the conditions of the attached Administrative Amendment No. 017-25554-00027.

**Appendix A: Emissions Calculations
Surface Coating: Dip Spin Line #4 (EU-10)
VOC Emissions**

Page 1 of 4 TSD, Appendix A

**Company Name: Tinnerman Palnut Engineered Products, Inc., Logansport Plant
Address: 800 West County Road 250 South
Administrative Amendment: 017-25554-00027
Reviewer: ERG/JR
Date: December 13, 2007**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Maximum Usage Rate (gal/hr)	Pounds VOC per Gallon of Coating less Water	Pounds VOC per Gallon of Coating	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)
MCI Geomet Water Based Paint	11.26	60.19%	50.15%	10.04%	65.21%	14.00%	1.00	3.25	1.13	1.13	4.95

METHODOLOGY

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

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

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Material Usage Rate (gal/hr)

PTE of VOC (tons/year) = Pounds of VOC per Gallon of Coating (lbs/gal) * Material Usage Rate (gal/hr) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Combustion and Process Emissions
Heat Treat Furnace #2 (EU-11)**

Company Name: Tinnerman Palnut Engineered Products, Inc., Logansport Plant
Address: 800 West County Road 250 South
Administrative Amendment: 017-25554-00027
Reviewer: ERG/JR
Date: December 13, 2007

CO Process Emissions

Chemical Reaction: $N_2 + CH_3OH + 2CH_4 + O_2 \rightarrow N_2 + CO + CO_2CH_4 + 4H_2$
 For every one pound of CH_3OH that is used, 0.87422 pounds of CO is created.

Max. CH_3OH Usage	Density	Max. CH_3OH Usage	Max. CH_3OH Usage	Emission Factor	Fire Protection Burnoff Efficiency	CO Emissions to Atmosphere	CO Emissions to Atmosphere
(gal/day)	(lb/gal)	(lb/day)	(lb/hr)	(lb CO/lb CH_3OH)	(%)	(lb/hr)	(ton/yr)
200	6.59	1318	54.9	0.87	98.5	0.72	3.15

Methodology:

CO Emissions to Atmosphere (ton/yr) = Max. CH_3OH Usage (gal/day) * Density (lb/gal) * 1 day/24 hr * Emission Factor (lb CO/lb CH_3OH) * (1-Fire Protection Burnoff Efficiency) * 1 ton/2000 lbs

Combustion Emissions:

Maximum Heat Input MMBtu/hr	Potential Throughput MMCF/yr
1.81	16.2

Criteria Pollutants

	Pollutant					
Emission Factor*	PM	PM10	SO ₂	NO _x	VOC	CO
Units	1.9 lb/MMCF	7.6 lb/MMCF	0.6 lb/MMCF	100.0 lb/MMCF	5.5 lb/MMCF	84.0 lb/MMCF
Potential Emission in tons/yr	0.02	0.06	4.85E-03	0.81	0.04	0.68

* Emission factors from Fifth Edition AP-42, Section 1.4, "Natural Gas Combustion", 7/98.

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	1.70E-05	9.70E-06	6.06E-04	1.46E-02	2.75E-05

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	4.04E-06	8.89E-06	1.13E-05	3.07E-06	1.70E-05

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 (AP-42 Supplement D 3/98)

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

All Emission factors are based on normal firing.

Methodology*Criteria Pollutants*

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Potential Emission in tons/yr = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) * 1 ton/2000 lbs

HAPs

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

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

**Appendix A: Emission Calculations
Combustion Emissions
Insignificant Combustion Activities**

**Company Name: Tinnerman Palnut Engineered Products, Inc., Logansport Plant
Address: 800 West County Road 250 South
Administrative Amendment: 017-25554-00027
Reviewer: ERG/JR
Date: December 13, 2007**

Description of Insignificant Combustion Activities:

One (1) spin drying oven on coating Line No. 4 with a maximum heat input capacity of 1.5 million British thermal units (MMBtu) per hour.

Two (2) aqueous mechanical plating drying ovens each with a maximum heat input capacity of 0.18 million British thermal units (MMBtu) per hour.

Maximum Heat Input MMBtu/hr	Potential Throughput MMCF/yr
1.86	16.6

Criteria Pollutants

	Pollutant					
Emission Factor* Units	PM 1.9 lb/MMCF	PM10 7.6 lb/MMCF	SO ₂ 0.6 lb/MMCF	NO _x 100.0 lb/MMCF	VOC 5.5 lb/MMCF	CO 84.0 lb/MMCF
Potential Emission in tons/yr	1.58E-02	6.32E-02	4.99E-03	0.83	4.57E-02	0.70

* Emission factors from Fifth Edition AP-42, Section 1.4, "Natural Gas Combustion", 7/98.

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	1.75E-05	9.97E-06	6.23E-04	1.50E-02	2.83E-05

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	4.15E-06	9.14E-06	1.16E-05	3.16E-06	1.75E-05

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

All Emission factors are based on normal firing.

Methodology

Criteria Pollutants

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Potential Emission in tons/yr = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) * 1 ton/2000lbs

HAPs

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

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

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Tinnerman Palnut Engineered Products, Inc., Logansport Plant
Address: 800 West County Road 250 South
Administrative Amendment: 017-25554-00027
Reviewer: ERG/JR
Date: December 13, 2007

Potential To Emit Before Control (tpy)							
Emission Units	PM	PM10	SO₂	NO_x	VOC	CO	Total HAPs
Dip Spin Line #4 (EU-10)	-	-	-	-	4.95	-	-
Heat Treat Furnace #2 (EU-11)	0.02	0.06	4.85E-03	0.81	0.04	3.83	0.02
Insignificant Combustion	1.58E-02	6.32E-02	4.99E-03	0.83	4.57E-02	0.70	1.57E-02
Total PTE	0.03	0.12	0.01	1.64	5.04	4.53	0.03