INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 5, 2008

RE: Mathew-Warren, Inc. / 017-26357-00022

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07

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Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Matthew-Warren, Inc.

Plants #1 and #3 - 500 E. Ottawa St., Logansport, IN 46947
Plant #2 - 300 E. Miami Ave., Logansport, IN 46947
Plant #5 - 801 Bates Street, Logansport, IN 46947
Plant #6 - 131 Godfrey St., Logansport, IN 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.: F 017-26357-00022	
Issued by: Original signed by Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:July 5, 2008 Expiration Date:July 5, 2018

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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 steel spring manufacturing source.

Source Address:	Plant #1 and Plant #3 - 500 E. Ottawa St., Logansport, Indiana 46947 Plant #2 - 300 E. Miami Ave., Logansport, Indiana 46947 Plant #5 - 801 Bates St., Logansport, IN 46947 Plant #6 - 131 Godfrey St., Logansport, IN 46947
Mailing Address:	P.O. Box 7008, Logansport, IN 46947
General Source Phone Number:	(574) 722-8309
SIC Code:	3495
County Location:	Cass
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) Plant #1:

(1) One (1) segment, identified as SCP101, installed in 1952, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through three (3) stacks (ID #'s S101A, S101C and S101D).

(2) One (1) segment, identified as SCP102, installed in 1952, for marking steel springs with a rollcoater or stamper, and exhausting through two (2) stacks (ID #'s S102A and S102B).

(3) One (1) segment, identified as SCP103, installed in 1952, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through two (2) stacks (ID #'s S103A and S103B).

(4) One (1) operation identified as grinding tooling department consisting of one (1) small hand grinder controlled by one (1) baghouse identified as 125x030 (GP101).

(5) One (1) operation identified as Department 122 consisting of:

(A) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101), installed in 1951.

(B) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103), installed in 1951.

(6) One (1) operation identified as Department 125 consisting of:

(A) Sixteen (16) grinders, with two (2) of the grinders controlled by a dust collector identified as 125x030 (GP101), installed in 1951; with four (4) of the grinders controlled by a dust collector identified as 125x031 (GP102), installed in 1951; and ten of the grinders controlled by a dust collector identified as 125x032 (GP104), installed in 1951.

(B) Two hand grinders

(7) One (1) operation identified as Department 119 (segment 1) consisting of a shot peen unit identified as 123H004 (GP105), installed in 1980, controlled by the dust collector and exhausting inside the building.

(8) One (1) operation identified as shot peening department consisting of four (4) shot peens, each using steel shot and controlled by one (1) baghouse identified as 533x005 (GP103), installed in 1951.

(9) One (1) operation identified as Department 123 (medium coiling) consisting of one (1) grinder controlled by a dust collector 125x032 (GP104), installed in 1951.

(10) One (1) operation identified as Department 127 consisting of the following:

(A) One (1) shot peen unit identified as 127H001 controlled by a dust collector 533x005 (GP103), installed in 1951.

(B) Three (3) grinders and one (1) chamfer, each controlled by a dust collector 125x032 (GP104), installed in 1951.

(b) Plant #2:

(1) One (1) segment, identified as SCP201, installed in 1960, for applying water based paints by dipping steel springs in a dip tank and then putting onto a conveyorized rack for drying.

(2) One (1) operation identified as hot coil department consisting of the following:

(A) One (1) shot peen unit identified as 533H011 and controlled by a dust collector 230x024 (GP202), installed in 1960.

(B) One (1) shot peen unit identified as 30H12 controlled by a dust collector 230x024 (GP202), installed in 1960, and two (2) spring presses.

(C) Two (2) hand grinders controlled by a dust collector identified as 233x023 (GP201), installed in 1960.

(D) Two (2) abrasive saws controlled by drum dust collector.

(c) Plant #3:

There are no activities qualified as significant at the plant.

(d) Plant #6:

(1) One (1) powder coating application system, identified as 280PC01, for electrostatic spray

application of dry epoxy powder to coiled steel springs, using dry filter for overspray control.

(e) Plant #5:

There are no activities qualified as significant at the plant.

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) segment in Plant #3, identified as SCP301, where steel T-bar ends are dipped into a small dip tank for identification coating and then put onto a rack to air dry.

(b) Natural gas-fired combustion sources with heat input equal or less than ten (10) mmBtu/hr.

(1) Two (2) natural gas fired ovens (135L003 and 135L009) located under the stress relieve and heatset department at Plant #1, each rated at 0.53 and 1.0 MMBtu/hr, respectively.

(2) One (1) natural gas-fired oven (135L008) located under Department 135 at Plant #1, rated at 0.18 MMBtu/hr.

(3) Three (3) natural gas fired ovens (135L007, 135L005 and 135L001) located under Department 123 at Plant #1, each rated at 0.5, 0.8 and 0.53 MMBtu/hr.

(4) Two (2) natural gas fired furnaces (K30 and L20) located under the heat treat department at Plant #2, each rated at 4.2 and 1.2 MMBtu/hr.

(5) Three (3) natural gas fired furnaces located under the heat treat department at Plant #2, each rated at 1.0 MMBtu/hr.

(6) Three (3) natural gas fired bar furnaces (J17, J16, J11) located under the hot coil department at Plant #2, each rated at 2.0, 1.5 and 4.10 MMBtu/hr.

(7) Three (3) natural gas fired draw furnaces located under the hot coil department, each rated at 2.0, 1.0, and 0.8 MMBtu/hr.

(8) One (1) natural gas fired stress relief oven rated at 0.8 MMBtu/hr and one (1) natural gas fired annealing furnace rated at 0.2 MMBtu/hr, both located at Plant #3.

(9) Two (2) natural gas fired furnaces, each rated at 1.2 MMBtu/hr and located at Plant #5.

(10) Two (2) natural gas-fired radiant solution heaters (280AA01-1 and 280AA01-2) with maximum heat input capacities of 1.75 mmBtu/hr and 0.95 mmBtu/hr, located at Plant #6.

(11) Two (2) natural gas-fired furnaces for drying parts and powder curing (280J001 and 280J002) with maximum heat input capacities of 1.5 mmBtu/hr and 2.5 mmBtu/hr, located at Plant #6.

(12) One (1) natural gas-fired controlled pyrolysis cleaning furnace for cleaning fixtures, identified as 280J003, with a maximum heat input capacity of 0.950 mmBtu/hr, located at Plant #6. The furnace is equipped with an integral thermal oxidizer, using a maximum of 0.56 mmBtu/hr of natural gas.

(c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(e) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.

(f) Application of oils, lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]

(i) Groundwater oil recovery wells.

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

(k) Quenching operations used with heat treating processes.

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

(m) Process vessel degassing and cleaning to prepare for internal repairs.

(n) Paved and unpaved roads and parking lots with public access.

(o) 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.

(p) Blowdown for any of the following: sight glass, boiler, compressors, pump and cooling tower.

(q) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(1) One (1) belt sander, one (1) feeder, two (2) multislides, one (1) small grinder controlled by a dust collector with air flow rate of 900 acfm and venting inside the building (Plant #3). [326 IAC 6-3-2]

(2) Tool and dye shop consisting of drill presses, cutting saws, lathes, mill, one (1) blanchard wet grinder (340F027), one (1) wet surface grinder, two surface grinders, one (a) cutoff saw, one (1) dust collector controlling particulate

emissions from the five (5) grinders and one (1) bead blast unit (340H002) with an air flow rate of 900 acfm (Plant #3). [326 IAC 6-3-2]

(3) Two (2) shot peen units identified as 550H01 and 550H02, each controlled by one (1) dust collector identified as 550x01 and 550x02, and with the air flow rate of 765 and 935 acfm, respectively (Plant #5). [326 IAC 6-3-2]

(4) One (1) wet grinder identified as 125F041 controlled by a dust collector with the flow rate of 100 acfm and exhausting indoors (Plant #1 first floor). [326 IAC 6-3-2]

(5) Two (2) grinders identified as 122F11 and 122F04, each controlled by a dust collector with the flow rate of 100 acfm, identified as 122x01 (Department 22). [326 IAC 6-3-2]

(6) One (1) shot peen unit identified as 230H001 and controlled by a dust collector (230x002) with air flow rate of 900 acfm (Plant #2 hot coil department). [326 IAC 6-3-2]

(r) Miscellaneous use of VOC containing materials for cleaning, part washing, quality assurance tests, and rust inhibiting the finished product consuming less than 3 pounds per hour or 15 pounds per day of VOC.

(1) Application of water soluble anti-rust solution identified as WS-72 at Plant #1 department 119.

(s) The maintenance activities for electric equipment which consumes greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAP.

(t) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):

Plant #1 (First Floor)

(1) One (1) ink application operation through stamp pad.
(2) One (1) operation identified as millwright department consisting of one (1) degreaser [326 IAC 8-3-2].

Plant #1 (Basement)

(3) One (1) parts degreasing operation for department 127 [326 IAC 8-3-2].
(4) One (1) parts degreasing operation for department 135 [326 IAC 8-3-2].
(5) One (1) paint operation using dip coating application method.
(6) Two (2) oiling stations.

Plant #2

(7) One (1) maintenance department parts degreasing operation.

Plant #3

(8) One (1) parts degreasing operation [326 IAC 8-3-2].
(9) One (1) GM torque rod line consisting of the following:

(A) One (1) nylon spraying operation controlled by cartridge filter capturing particulates. [326 IAC 6-3-2]

(B) One (1) paint application operation (F78WX) using dipping application method.

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, F 017-26357-00022, 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 July 1 of each year to:

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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 F 017-26357-00022 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

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

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

(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] [326 IAC 2-2]

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 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 Licensed 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 Licensed 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.8 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.9 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.10 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.11 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.12 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.13 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.14 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.15 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.16 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.

Stratospheric Ozone Protection

C.17 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:

Plant #1:

(a) One (1) segment, identified as SCP101, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through three (3) stacks (ID #'s S101A, S101C and S101D).

(b) One (1) segment, identified as SCP102, for marking steel springs with a rollcoater or stamper, and exhausting through two (2) stacks (ID #'s S102A and S102B).

(c) One (1) segment, identified as SCP103, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through two (2) stacks (ID #'s S103A and S103B).

Plant #2:

(a) One (1) segment, identified as SCP201, for applying water based paints by dipping steel springs in a dip tank and then putting onto a conveyorized rack for drying.

Insignificant Activity

Plant #3:

(a) One (1) segment in Plant #3, identified as SCP301, where steel T-bar ends are dipped into a small dip tank for identification coating and then put onto a rack to air dry.

(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.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

The Permittee shall comply with the following:

(a) The total input usage of any single hazardous air pollutant (HAP) delivered to the applicators in the surface coating operations (identified as SCP101, SCP102, SCP103, SCP201, and SCP301), including HAP usage for clean-up, shall be less than 9.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 9.7 tons per twelve (12) consecutive month period and renders 326 IAC 2-7 not applicable.

(b) The total input usage of the combined HAPs delivered to the applicators in the surface coating operations (identified as SCP101, SCP102, SCP103, SCP201, and SCP301), including combined HAP usage for clean-up, shall be less than 24.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the source-wide potential to emit total HAPs to less than 24.7 tons per twelve (12) consecutive month period and renders 326 IAC 2-7 not applicable.

D.1.2 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 this facility and any control devices.

Compliance Determination Requirements

D.1.3 HAPs [326 IAC 8-1-4] [326 IAC 8-1-2]

Compliance with the HAP usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.4 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total single and total combination HAPs usage for most recent the twelve (12) month period.

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

D.1.5 Record Keeping Requirement

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(2) The amount of coating material and solvent less water used on daily 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 volume weighted HAP content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total HAP usage for each month; and

(6) The weight of HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant #1:

(d) One (1) operation identified as grinding tooling department consisting of one (1) small hand grinder controlled by one (1) baghouse identified as 125x030 (GP101).

(e) One (1) operation identified as Department 122 consisting of:

(1) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101).

(2) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103).

(f) One (1) operation identified as Department 125 consisting of:

(1) Sixteen (16) grinders, with two (2) of the grinders controlled by a dust collector identified as 125x030 (GP101); with four (4) of the grinders controlled by a dust collector identified as 125x031 (GP102); and ten of the grinders controlled by a dust collector identified as 125x032 (GP104).

(2) Two hand grinders

(g) One (1) operation identified as Department 119 (segment 1) consisting of a shot peen unit identified as 123H004 (GP105) controlled by the dust collector and exhausting inside the building.

(h) One (1) operation identified as shot peening department consisting of four (4) shot peens, each using steel shot and controlled by one (1) baghouse identified as 533x005 (GP103).

(i) One (1) operation identified as Department 123 (medium coiling) consisting of one (1) grinder controlled by a dust collector 125x032 (GP104).

(j) One (1) operation identified as Department 127 consisting of the following:

(1) One (1) shot peen unit identified as 127H001 controlled by a dust collector 533x005 (GP103).

(2) Three (3) grinders and one (1) chamfer, each controlled by a dust collector 125x032 (GP104).

Plant #2:

(b) One (1) operation identified as hot coil department consisting of the following:

(1) One (1) shot peen unit identified as 533H011 and controlled by a dust collector 230x024 (GP202).

(2) One (1) shot peen unit identified as 30H12 controlled by a dust collector

230x024 (GP202), and two (2) spring presses.

(3) Two (2) hand grinders controlled by a dust collector identified as 233x023 (GP201).

(4) Two (2) abrasive saws controlled by drum dust collector.

Plant #6:

(a) One (1) powder coating application system, identified as 280PC01, for electrostatic spray application of dry epoxy powder to coiled steel springs, using dry filter for overspray control.

(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 PM10 [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

(1) The PM10 emissions from each segment GP 101, GP 102, and GP 103 shall not exceed 1.72 lb/hr after controls.

(2) The PM10 emissions from segment GP 104 shall not exceed 4.77 lbs/hr after controls.

(3) The PM10 emissions from each segment GP 105 and GP 202 shall not exceed 0.58 lb/hr after controls.

(4) The PM10 emissions from segment GP 201 shall not exceed 2.35 lbs/hr after controls.

D.2.2 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the grinding and shot peen operation shall not exceed the following limits:

(1) 1.72 pounds per hour, when operating at a process weight rate of 0.273 ton per hour for segment GP 101,

(2) 1.72 pounds per hour, when operating at a process weight rate of 0.273 ton per hour for segment GP 102,

(3) 1.72 pounds per hour, when operating at a process weight rate of 0.273 ton per hour for segment GP 103,

(4) 4.77 pounds per hour when operating at a process weight rate of 1.255 tons per hour for segment GP 104,

(5) 0.58 pound per hour, when operating at a process weight rate of 0.055 ton per hour for segment GP 105

(6) 2.35 pounds per hour when operating at a process weight rate of 0.437 ton per hour for segment GP 201.

(7) 0.58 pound per hour, when operating at a process weight rate of 0.055 ton per hour for segment GP 202,

For operations with a process weight rate up to sixty thousand (60,000) pounds per hour, the following formula will be used to calculate the maximum amount of uncontrolled PM emissions allowed:

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

D.2.3 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the dry cartridge filter shall control the PM emissions from the powder coating application system, identified as 280PC01. The dry cartridge filter shall be operated in accordance with the manufacturer's specifications.

D.2.4 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 shot blasters and their control devices.

Compliance Determination Requirements

D.2.5 Particulate Control

(a) In order to comply with D.2.1 and D.2.2, the baghouses for particulate control shall be in operation and control particulate emissions from the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202), at all times that the units are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(c) The Permittee shall operate the integral dry cartridge filter on the powder coating application system, identified as 280PC01 and control emissions from the facility at all times that the powder coating application system, identified as 280PC01, is in operation.

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

D.2.6 Visible Emission Notations

(a) Visible emission notations of the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202) stacks exhaust shall be performed once daily during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.7 Baghouse Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP202), at least once per day when the units are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses 125X30, 125X31, 533X05, 125X32, 123H04, 230X23, and 230X24 is outside the normal ranges of 1.0 and 1.5, 1.2 and 1.7, 0.8 and 1.3, 1.8 and 2.6, 2.5 and 4, 0.6 and 1.1, and 0.8 and 1.3 inches of water, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedences. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For a single compartment baghouse controlling emissions from a process operated continuously then a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B -Emergency Provisions).

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

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

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

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain a daily record of visible emission notations of the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).

(b) To document compliance with Condition D.2.7, the Permittee shall maintain a daily record of the pressure drop during normal operation when venting to the atmosphere.

The Permittee shall include in its daily records when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

(a) One (1) natural gas-fired controlled pyrolysis cleaning furnace for cleaning fixtures, identified as 280J003, with a maximum heat input capacity of 0.950 mmBtu/hr, located at Plant #6. The furnace is equipped with an integral thermal oxidizer, using a maximum of 0.56 mmBtu/hr of natural gas.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(1) One (1) belt sander, one (1) feeder, two (2) multislides, one (1) small grinder controlled by a dust collector with air flow rate of 900 acfm and venting inside the building (plant #3). [326 IAC 6-3-2]

(2) Tool and dye shop consisting of drill presses, cutting saws, lathes, mill, one (1) blanchard wet grinder (340F027), one (1) wet surface grinder, two surface grinders, one (a) cutoff saw, one (1) dust collector controlling particulate emissions from the five (5) grinders and one (1) bead blast unit (340H002) with an air flow rate of 900 acfm (plant #3). [326 IAC 6-3-2]

(3) Two (2) shot peen units identified as 550H01 and 550H02, each controlled by one (1) dust collector identified as 550x01 and 550x02, and with the air flow rate of 765 and 935 acfm, respectively (plant #5). [326 IAC 6-3-2]

(4) One (1) wet grinder identified as 125F041 controlled by a dust collector with the flow rate of 100 acfm and exhausting indoors (plant 1 first floor). [326 IAC 6-3-2]

(5) Two (2) grinders identified as 122F11 and 122F04, each controlled by a dust collector with the flow rate of 100 acfm, identified as 122x01 (Department 22). [326 IAC 6-3-2]

(6) One (1) shot peen unit identified as 230H001 and controlled by a dust collector (230x002) with air flow rate of 900 acfm (plant 2 hot coil department). [326 IAC 6-3-2]

(d) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):

Plant 1 (First Floor)

(1) One (1) operation identified as millwright department consisting of one (1) degreaser [326 IAC 8-3-2].

Plant 1 (Basement)

(2) One (1) parts degreasing operation for department 127 [326 IAC 8-3-2].
(3) One (1) parts degreasing operation for department 135 [326 IAC 8-3-2].

Plant #2

(4) One (1) maintenance department parts degreasing operation. [326 IAC 8-3-2]

Plant #3

(5) One (1) parts degreasing operation [326 IAC 8-3-2].
(6) One (1) GM torque rod line consisting of the following:

(A) One (1) nylon spraying operation controlled by cartridge filter capturing particulates. [326 IAC 6-3-2]

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

D.3.1 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 the pyrolysis cleaning furnace (280J003) shall:

(a) Consist of primary and secondary chambers or the equivalent.

(b) Be equipped with a primary burner unless burning only wood products.

(c) Comply with 326 IAC 5-1 and 326 IAC 2.

(d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c).

(e) Not emit particulate matter in excess of:

(1) Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity less than two hundred (200) pounds per hour.

(f) If any of the requirements of subdivisions (a) through (e) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(g) An incinerator is exempt from subdivision (e) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

(h) An owner or operator developing an operation and maintenance plan pursuant to subdivision (d) must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (e) and include the following:

(A) Procedures for receiving, handling, and charging waste.
(B) Procedures for incinerator startup and shutdown.
(C) Procedures for responding to a malfunction.
(D) Procedures for maintaining proper combustion air supply levels.
(E) Procedures for operating the incinerator and associated air pollution control systems.
(F) Procedures for handling ash.
(G) A list of wastes that can be burned in the incinerator.

(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(3) The operation and maintenance plan must be readily accessible to incinerator operators.

(i) The owner and operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

D.3.2 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 owner or operator 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.3.3 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Compliance Determination Requirements

D.3.4 VOC Control

The Permittee shall operate the integral thermal oxidizer for the pyrolysis cleaning furnace (280J003) and control VOC emissions from the facility at all times the pyrolysis cleaning furnace (280J003) is in operation

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Matthew-Warren, Inc.
Source Address: Plant #1 and Plant #3 - 500 E. Ottawa St., Logansport, Indiana 46947
Plant #2 - 300 E. Miami Ave., Logansport, Indiana 46947
Plant #5 - 801 Bates St., Logansport, IN 46947
Plant #6 - 131 Godfrey St., Logansport, IN 46947
Mailing Address: P.O. Box 7008, Logansport, IN 46947
FESOP Permit No.: F 017-26357-00022

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:	Matthew-Warren, Inc.
Source Address:	Plant #1 and Plant #3 - 500 E. Ottawa St., Logansport, Indiana 46947 Plant #2 - 300 E. Miami Ave., Logansport, Indiana 46947 Plant #5 - 801 Bates St., Logansport, IN 46947 Plant #6 - 131 Godfrey St., Logansport, IN 46947
Mailing Address:	P.O. Box 7008, Logansport, IN 46947
FESOP Permit No.:	F 017-26357-00022

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- 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 Quarterly Report

Source Name: Matthew-Warren, Inc.
Source Address: Plant #1 and Plant #3 - 500 E. Ottawa St., Logansport, Indiana 46947
Plant #2 - 300 E. Miami Ave., Logansport, Indiana 46947
Plant #5 - 801 Bates St., Logansport, IN 46947
Plant #6 - 131 Godfrey St., Logansport, IN 46947
Mailing Address: P.O. Box 7008, Logansport, IN 46947
FESOP Permit No.: F 017-26357-00022
Facility: Surface coating operations (identified as SCP101, SCP102, SCP103, SCP201, and SCP301)
Parameter: Single and Combined Hazardous Air Pollutants (HAPs)
Limit: The total input usage of any single HAP, and total HAPs delivered to the applicators in the surface coating operations (identified as SCP101, SCP102, SCP103, SCP201, and SCP301) and during clean-up shall be limited to less than 9.7 and 24.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

YEAR:_____

Month	Total Usage This Month (tons)		Total Usage Previous 11 Months (tons)		Total Usage 12 Months (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
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: Matthew-Warren, Inc.
Source Address: Plant #1 and Plant #3 - 500 E. Ottawa St., Logansport, Indiana 46947
Plant #2 - 300 E. Miami Ave., Logansport, Indiana 46947
Plant #5 - 801 Bates St., Logansport, IN 46947
Plant #6 - 131 Godfrey St., Logansport, IN 46947
Mailing Address: P.O. Box 7008, Logansport, IN 46947
FESOP Permit No.: F 017-26357-00022

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ 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:	

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 a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Description and Location

Source Name:	**Matthew-Warren, Inc.**
Source Location:	**Plants #1 & #3 - 500 E. Ottawa St., Logansport, Indiana 46947** **Plant #2 - 300 E. Miami Ave., Logansport, IN 46947** **Plant #5 - 801 Bates St., Logansport, IN 46947** **Plant #6 - 131 Godfrey St., Logansport, IN 46947**
County:	**Cass**
SIC Code:	**3495**
Operation Permit No.:	**F 017-26357-00022**
Permit Reviewer:	**Jeremy Palin**

On March 31, 2008, the Office of Air Quality (OAQ) has received an application from Matthew-Warren, Inc. related to the operation of an existing steel spring manufacturing source.

Source Definition

This source consists of the following plants:

(a) Plants #1 and #3 are located at 500 E. Ottawa St. Logansport, Indiana 46947;
(b) Plant #2 is located at 300 E. Miami Ave., Logansport, IN 46947;
(c) Plant #5 is located at 801 Bates Street, Logansport, IN 46947, and
(d) Plant #6 is located at 131 Godfrey St., Logansport, IN 46947;

In order to consider all plants as one single source, all three of the following criteria must be met:

(1) The plants must have common ownership/control;
(2) The plants must have the same SIC code; and
(3) The plants must be located on contiguous or adjacent properties.

These plants are located on adjacent properties, have the same SIC codes of 3495 and are under common control, therefore they will be considered one (1) source, as defined by 326 IAC 2-7-1(22). This was initially determined in the FESOP 017-16766-00022, issued on December 30, 2003. Additionally, after consulting with the source it was determined that the plant issued Exemption 017-16750-00044, on March 11, 2003 will be combined with this FESOP and considered one single source. This plant will be known as Plant #6 located at 131 Godfrey St., Logansport, IN 46947.

Existing Approvals

The source has been operating under the following approvals:

(a) FESOP Renewal No. 017-16766-00022, issued on December 30, 2003; and
(b) Exemption No. 017-16750-00044, issued on March 11, 2003.

County Attainment Status

The source is located in Cass County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for $PM_{2.5}$.	

(a) Ozone Standards

(1) 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.

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

(3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

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

(b) Cass County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

(c) Other Criteria Pollutants
Cass County has been classified as attainment or unclassifiable in Indiana for SO2, CO, PM10 and NOx. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Matthew-Warren, Inc. on March 31, 2008, relating to the renewal of a FESOP for an existing steel spring manufacturing source.

The source consists of the following permitted emission units:

(a) Plant #1:

(1) One (1) segment, identified as SCP101, installed in 1952, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through three (3) stacks (ID #'s S101A, S101C and S101D).

(2) One (1) segment, identified as SCP102, installed in 1952, for marking steel springs with a rollcoater or stamper, and exhausting through two (2) stacks (ID #'s S102A and S102B).

(3) One (1) segment, identified as SCP103, installed in 1952, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through two (2) stacks (ID #'s S103A and S103B).

(4) One (1) operation identified as grinding tooling department consisting of one (1) small hand grinder controlled by one (1) baghouse identified as 125x030 (GP101).

(5) One (1) operation identified as Department 122 consisting of:

(A) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101), installed in 1951.

(B) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103), installed in 1951.

(6) One (1) operation identified as Department 125 consisting of:

(A) Sixteen (16) grinders, with two (2) of the grinders controlled by a dust collector identified as 125x030 (GP101), installed in 1951; with four (4) of the grinders controlled by a dust collector identified as 125x031 (GP102), installed in 1951; and ten of the grinders controlled by a dust collector identified as 125x032 (GP104), installed in 1951.

(B) Two hand grinders

(7) One (1) operation identified as Department 119 (segment 1) consisting of a shot peen unit identified as 123H004 (GP105), installed in 1980, controlled by the dust collector and exhausting inside the building.

(8) One (1) operation identified as shot peening department consisting of four (4) shot peens, each using steel shot and controlled by one (1) baghouse identified as 533x005 (GP103), installed in 1951.

(9) One (1) operation identified as Department 123 (medium coiling) consisting of one (1) grinder controlled by a dust collector 125x032 (GP104), installed in 1951.

(10) One (1) operation identified as Department 127 consisting of the following:

(A) One (1) shot peen unit identified as 127H001 controlled by a dust collector 533x005 (GP103), installed in 1951.

(B) Three (3) grinders and one (1) chamfer, each controlled by a dust collector 125x032 (GP104), installed in 1951.

(b) Plant #2:

(1) One (1) segment, identified as SCP201, installed in 1960, for applying water based paints by dipping steel springs in a dip tank and then putting onto a conveyorized rack for drying.

(2) One (1) operation identified as hot coil department consisting of the following:

(A) One (1) shot peen unit identified as 533H011 and controlled by a dust collector 230x024 (GP202), installed in 1960.

(B) One (1) shot peen unit identified as 30H12 controlled by a dust collector 230x024 (GP202), installed in 1960, and two (2) spring presses.

(C) Two (2) hand grinders controlled by a dust collector identified as 233x023 (GP201), installed in 1960.

(D) Two (2) abrasive saws controlled by drum dust collector.

(c) Plant #3:

There are no activities qualified as significant at the plant.

(d) Plant #6:

(1) One (1) powder coating application system, identified as 280PC01, for electrostatic spray application of dry epoxy powder to coiled steel springs, with a dry filter which is considered as an integral part of the process. (see Page 7 of this TSD for details)

(e) Plant #5:

There are no activities qualified as significant at the plant.

(f) Insignificant activities consisting of the following:

(1) One (1) segment in Plant #3, identified as SCP301, where steel T-bar ends are dipped into a small dip tank for identification coating and then put onto a rack to air dry.

(2) Natural gas-fired combustion sources with heat input equal or less than ten (10) mmBtu/hr.

(A) Two (2) natural gas fired ovens (135L003 and 135L009) located under the stress relieve and heatset department at Plant #1, each rated at 0.53 and 1.0 MMBtu/hr, respectively.

(B) One (1) natural gas-fired oven (135L008) located under Department 135 at plant 1, rated at 0.18 MMBtu/hr.

(C) Three (3) natural gas fired ovens (135L007, 135L005 and 135L001) located under Department 123 at Plant #1, each rated at 0.5, 0.8 and 0.53 MMBtu/hr.

(D) Two (2) natural gas fired furnaces (K30 and L20) located under the heat treat department at Plant #2, each rated at 4.2 and 1.2 MMBtu/hr.

(E) Three (3) natural gas fired furnaces located under the heat treat department at Plant #2, each rated at 1.0 MMBtu/hr.

(F) Three (3) natural gas fired bar furnaces (J17, J16, J11) located under the hot coil department at Plant #2, each rated at 2.0, 1.5 and 4.10 MMBtu/hr.

(G) Three (3) natural gas fired draw furnaces located under the hot coil department, each rated at 2.0, 1.0, and 0.8 MMBtu/hr.

(H) One (1) natural gas fired stress relief oven rated at 0.8 MMBtu/hr and one (1) natural gas fired annealing furnace rated at 0.2 MMBtu/hr, both located at Plant #3.

(I) Two (2) natural gas fired furnaces, each rated at 1.2 MMBtu/hr and located at Plant #5.

(J) Two (2) natural gas-fired radiant solution heaters (280AA01-1 and 280AA01-2) with maximum heat input capacities of 1.75 mmBtu/hr and 0.95 mmBtu/hr, located at Plant #6.

(K) Two (2) natural gas-fired furnaces for drying parts and powder curing (280J001 and 280J002) with maximum heat input capacities of 1.5 mmBtu/hr and 2.5 mmBtu/hr, located at Plant #6.

(L) One (1) natural gas-fired controlled pyrolysis cleaning furnace for cleaning fixtures, identified as 280J003, with a maximum heat input capacity of 0.950 mmBtu/hr, located at Plant #6. The furnace is equipped with an integral thermal oxidizer, using a maximum of 0.56 mmBtu/hr of natural gas.

(3) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(4) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(5) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.

(6) Application of oils, lubricants or other nonvolatile materials applied as temporary protective coatings.

(7) Machining where an aqueous cutting coolant continuously floods the machining interface.

(8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]

(9) Groundwater oil recovery wells.

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

(11) Quenching operations used with heat treating processes.

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

(13) Process vessel degassing and cleaning to prepare for internal repairs.

(14) Paved and unpaved roads and parking lots with public access.

(15) 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.

(16) Blowdown for any of the following: sight glass, boiler, compressors, pump and cooling tower.

(17) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(A) One (1) belt sander, one (1) feeder, two (2) multislides, one (1) small grinder controlled by a dust collector with air flow rate of 900 acfm and venting inside the building (Plant #3). [326 IAC 6-3-2]

(B) Tool and dye shop consisting of drill presses, cutting saws, lathes, mill, one (1) blanchard wet grinder (340F027), one (1) wet surface grinder, two surface grinders, one (a) cutoff saw, one (1) dust collector controlling particulate emissions from the five (5) grinders and one (1) bead blast unit (340H002) with an air flow rate of 900 acfm (Plant #3). [326 IAC 6-3-2]

(C) Two (2) shot peen units identified as 550H01 and 550H02, each controlled by one (1) dust collector identified as 550x01 and 550x02, and with the air flow rate of 765 and 935 acfm, respectively (Plant #5). [326 IAC 6-3-2]

(D) One (1) wet grinder identified as 125F041 controlled by a dust collector with the flow rate of 100 acfm and exhausting indoors (Plant #1 first floor). [326 IAC 6-3-2]

(E) Two (2) grinders identified as 122F11 and 122F04, each controlled by a dust collector with the flow rate of 100 acfm, identified as 122x01 (Department 22). [326 IAC 6-3-2]

(F) One (1) shot peen unit identified as 230H001 and controlled by a dust collector (230x002) with air flow rate of 900 acfm (Plant #2 hot coil department). [326 IAC 6-3-2]

(18) Miscellaneous use of VOC containing materials for cleaning, part washing, quality assurance tests, and rust inhibiting the finished product consuming less than 3 pounds per hour or 15 pounds per day of VOC.

(A) Application of water soluble anti-rust solution identified as WS-72 at Plant #1 department 119.

(19) The maintenance activities for electric equipment which consumes greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAP.

(20) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):

Plant #1 (First Floor)

(A) One (1) ink application operation through stamp pad.
(B) One (1) operation identified as mill wright department consisting of one (1) degreaser [326 IAC 8-3-2].

Plant #1 (Basement)

(C) One (1) parts degreasing operation for department 127 [326 IAC 8-3-2].
(D) One (1) parts degreasing operation for department 135 [326 IAC 8-3-2].
(E) One (1) paint operation using dip coating application method.
(F) Two (2) oiling stations.

Plant #2

(G) One (1) maintenance department parts degreasing operation. [326 IAC 8-3-2]

Plant #3

(H) One (1) parts degreasing operation [326 IAC 8-3-2].
(I) One (1) GM torque rod line consisting of the following:

(i) One (1) nylon spraying operation controlled by cartridge filter capturing particulates. [326 IAC 6-3-2]

(ii) One (1) paint application operation (F78WX) using dipping application method.

There are no new emissions units at the source during this review.

"Integral Part of the Process" Determination

The Permittee has submitted the following information to justify why the dry cartridge filter should be considered an integral part of the powder coating process:

(a) The dry cartridge filter for overspray control, housed in an environmentally controlled room, is integrated into the spray booth for the powder coating application system, identified as 280PC01. All of the powder recovered is returned to the process to be mixed with new powder. The cost of the cartridge filter is $15,500. The cost savings from powder recovery is $43.5 per hour or $38,097.2 per year. Therefore, the primary purpose of the cartridge filter is powder recovery.

IDEM, OAQ has evaluated the information submitted and agrees that the dry cartridge filter should be considered an integral part of the powder coating process. This determination is based on the fact that there is an overwhelming economic advantage to using the control device, and its primary purpose is powder paint recovery. Therefore, the permitting level will be determined using the potential to emit after the dry cartridge filter. Operating conditions in the proposed permit will specify that this dry cartridge filter shall operate at all times when the powder coating process is in operation. This determination was similar to the initial determination made under Exemption No. 017-16750-00044, issued on March 11, 2003.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

The PTE of the powder coating application system, identified as 280PC01, is negligible for PM and PM-10 since the dry filter is an integral control device and the captured paint is reused. This determination was made in Exemption No. 017-16750-00044, issued on March 11, 2003

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	188.96
PM10[(1)]	189.77
SO_2	0.09
NO_x	14.25
VOC	93.90
CO	11.97

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

HAPs	Potential To Emit (tons/year)
Xylene	13.76
Toluene	63.80
Lead	1.04
Formaldehyde	0.04
Ethylbenzene	0.50
Glycol Ethers	10.38
Triethylamine	1.30
Cobalt Compound	negligible
Chromium Compound	negligible
TOTAL HAPs	**91.05**

(a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM and PM10 is still greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) Renewal (326 IAC 2-8), because the source will continue to limit emissions to less than the Title V major source threshold levels.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is still greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a FESOP Renewal (326 IAC 2-8), because the source will continue to limit emissions of HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

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

	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)							
Process/Emission Unit	PM	PM10*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating (SCP101, SCP102, SCP103, SCP201 and 280PC01)	negl.	negl.	0.00	0.00	89.64	0.00	23.60	9.60
Segment GP 101	19.25	7.53	0.00	0.00	0.00	0.00	0.00	0.00
Segment GP 102	19.25	7.53	0.00	0.00	0.00	0.00	0.00	0.00
Segment GP 103	19.25	7.53	0.00	0.00	0.00	0.00	0.00	0.00
Segment GP 104	88.53	20.89	0.00	0.00	0.00	0.00	0.00	0.00
Segment GP 105	2.54	2.54	0.00	0.00	0.00	0.00	0.00	0.00
Segment GP 201	10.29	4.62	0.00	0.00	0.00	0.00	0.00	0.00
Segment GP 202	2.54	10.29	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities**	4.21	5.02	0.09	14.25	4.26	11.97	0.23	0.21
Total PTE of Entire Source	188.96	63.87(1)	0.09	14.25	93.90(3)	11.97	23.83(2)	9.81(2)
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
Emission Offset Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
** Insignificant activities include natural gas fired combustion units, degreasing operations, powder coating operation, grinding and shot peening operation, and miscellaneous solvent usage.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

(1) In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

(a) The emissions from each segment GP 101, GP 102, and GP 103 shall not exceed 1.72 lbs/hr for PM10 after controls.

(b) The emissions from segment GP 104 shall not exceed 4.77 lbs/hr for PM10 after controls.

(c) The emissions from each segment GP 105 and GP 202 shall not exceed 0.58 lb/hr for PM10 after controls.

(d) The emissions from segment GP 201 shall not exceed 2.35 lbs/hr for PM10 after controls.

Compliance with these limits, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than 100 tons per 12 consecutive month period.

(2) In order to comply with the requirements of 326 IAC 2-8-4 the total input usage of any single HAP, and total HAPs delivered to the applicators in the surface coating operations (identified as SCP101, SCP102, SCP103, SCP201, and SCP301) and during clean-up shall be limited to less than 9.7 and 24.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

(3) The source's potential to emit VOC is based on the actual worst case VOC usage and is not based on the total usage input limit of HAPs.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM10, PM, SO2, NOx, VOC, and CO is less than 250 tons per year and the potential to emit all attainment regulated pollutants are less 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standards for Incinerators, 40 CFR 60.50, Subpart E (326 IAC 12), are not included in the permit, since the controlled pyrolysis cleaning furnace at this source processes less than fifty (50) tons per day of material and does not combust municipal waste.

(b) The requirements of the New Source Performance Standard for Standards of Performance for Metal Coil Surface Coating, 40 CFR 60.460, Subpart TT (326 IAC 12), are not included in the permit, since this source was constructed before the rule applicability date of January 5, 1981.

(c) The requirements of the New Source Performance Standard for Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced After November 30, 1999 or for Which Modification or Reconstruction is Commenced on or after June 1, 2001, 40 CFR 60.2000, Subpart CCCC (326 IAC 12), are not included in the permit, since the controlled pyrolysis furnace is a part reclamation unit pursuant to 40 CFR 60.2020(k), therefore, it is exempt from the requirements of the NSPS.

(d) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(e) The requirements of to the New Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Waste Combustors,40 CFR 63.1200 Subpart EEE 326 IAC 20-28, are not included in the permit, since the controlled pyrolysis cleaning furnace does not process hazardous wastes.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Coils, 40 CFR 63.5080 Subpart SSSS, 326 IAC 20-64, are not included in the permit, since this source has chosen to limit their sourcewide emissions to less than 10 tons of a single HAP and less than 25 tons of all HAPs, thus the source is not a major source of HAPs.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880 Subpart MMMM, 326 IAC 20-80, are not included in the permit, since this source has chosen to limit their sourcewide emissions to less than 10 tons of a single HAP and less than 25 tons of all HAPs, thus the source is not a major source of HAPs.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169 Subpart HHHHHH, are not included in the permit. While the source's paints do contain chromium compounds, they are not sprayed; therefore, the NESHAP does not apply to the source.

(i) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

(j) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

(a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(c) 326 IAC 2-3 (Emission Offset)
Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the surface coating operation is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the surface coating operation 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, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.

(e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

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

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 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.

(g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

<u>Pyrolysis Cleaning Operation</u>

(h) 326 IAC 4-2-2 (Incinerators)
Pursuant to 326 IAC 4-2-2 the pyrolysis cleaning furnace (280J003) shall:

(1) Consist of primary and secondary chambers or the equivalent.

(2) Be equipped with a primary burner unless burning only wood products.

(3) Comply with 326 IAC 5-1 and 326 IAC 2.

(4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c).

(5) Not emit particulate matter in excess of:

(A) Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity less than two hundred (200) pounds per hour.

(6) If any of the requirements of subdivisions (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(7) An incinerator is exempt from subdivision (5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

(8) An owner or operator developing an operation and maintenance plan pursuant to subdivision (4) must comply with the following:

(A) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (5) and include the following:

(i) Procedures for receiving, handling, and charging waste.
(ii) Procedures for incinerator startup and shutdown.
(iii) Procedures for responding to a malfunction.
(iv) Procedures for maintaining proper combustion air supply levels.
(v) Procedures for operating the incinerator and associated air pollution control systems.
(vi) Procedures for handling ash.
(vii) A list of wastes that can be burned in the incinerator.

(B) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(C) The operation and maintenance plan must be readily accessible to incinerator operators.

(9) The owner and operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

Grinding and Shot Peen Operation

(i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the grinding and shot peen operation shall not exceed the following limits:

(1) 1.72 pounds per hour each, when operating at a process weight rate of 0.273 ton per

hour for operations controlled by baghouses GP 101, GP 102, and GP 103,

(2) 4.77 pounds per hour when operating at a process weight rate of 1.255 tons per hour for operations controlled by baghouse GP 104,

(3) 0.58 pound per hour each, when operating at a process weight rate of 0.055 ton per hour for operations controlled by baghouses GP 105, and GP 202,

(4) 2.35 pounds per hour when operating at a process weight rate of 0.437 ton per hour for operations controlled by baghouse GP 201.

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

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

The baghouses shall be in operation at all times the grinding and shot peen operation is in operation, in order to comply with this limit.

Surface Coating Operation

(j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The source does not have any new or modified units with VOC emissions of twenty-five (25) tons per year or greater. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

(k) 326 IAC 8-2-4 (Coil Coating Operations)
The source does not have any new or modified emission units that commenced construction after July 1, 1990. Therefore, the requirements of 326 IAC 8-2-4 do not apply.

(l) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The source does not have any new or modified emission units that commenced construction after July 1, 1990. Therefore, the requirements of 326 IAC 8-2-4 do not apply.

(m) There are no other 326 IAC 8 Rules that are applicable to the facility.

Insignificant Activities including Cold Cleaning Operations

(n) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Therefore, all manufacturing process listed as insignificant activities shall not have PM emissions exceeding 0.551 pounds per hour, per emission unit.

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

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

(6) 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.

Compliance Determination, Monitoring and Testing Requirements

(a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Baghouses 125X30, 125X31, 125X32, 533X05, 123H04, 230X23, and 230X24	Pressure Drop	Once per day
Segments GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202	Visible Emissions Notation	Once per day

(b) There are no testing requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 31, 2008.

The operation of this source shall be subject to the conditions of the attached proposed FESOP Renewal No. 017-26357-00022. The staff recommends to the Commissioner that this FESOP Renewal be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Jeremy Palin at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5400 or toll free at 1-800-451-6027 extension 4-5400.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emission Calculations

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-26357-00022
Reviewer: Jeremy Palin
Date: April 7, 2008

Total Potential To Emit (tons/year)

	Emissions Generating Activity				
Pollutant	Surface Coating	Grinding and Shot Peen	Insignificant Activities Misc. Solvent Usage and Degreasing	Insignificant Activities *	**TOTAL**
PM	0.00	184.75	0.00	4.21	188.96
PM10	0.00	184.75	0.00	5.02	189.77
SO2	0.00	0.00	0.00	0.09	0.09
NOx	0.00	0.00	0.00	14.25	14.25
VOC	89.64	0.00	3.48	0.78	93.90
CO	0.00	0.00	0.00	11.97	11.97
total HAPs	90.82	0.00	negl.	0.23	91.05
worst case single HAP	63.80 (Toluene)	0.00	negl.	0.218 (Hexane)	63.80 (Toluene)

Total emissions based on rated capacities at 8,760 hours/year.

Limited Potential To Emit (tons/year)

	Emissions Generating Activity				
Pollutant	Surface Coating	Grinding and Shot Peen	Insignificant Activities Misc. Solvent Usage and Degreasing	Insignificant Activities *	**TOTAL**
PM	0.00	184.75	0.00	4.21	188.96
PM10	0.00	58.85	0.00	5.02	63.87
SO2	0.00	0.00	0.00	0.09	0.09
NOx	0.00	0.00	0.00	14.25	14.25
VOC	89.64	0.00	3.48	0.78	93.90
CO	0.00	0.00	0.00	11.97	11.97
total HAPs	< 25	0.00	negl.	0.23	< 25
worst case single HAP	(Toluene) < 10	0.00	negl.	0.218 (Hexane)	(Toluene) < 10

Total emissions based on rated capacities at 8,760 hours/year.

Single HAP and total HAPs emissions are limited to less than 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8-4.

* Insignificant activities include natural gas fired combustion units, degreasing operations, powder coating operation, grinding and shot peening operation, and miscellaneous solvent usage.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-26357-00022
Reviewer: Jeremy Palin
Date: April 7, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
SCP101, SCP102 and SCP103																
LX7002	7.99	65.10%	0.0%	65.1%	0.0%	34.33%	0.01600	60	5.20	5.20	4.99	119.84	21.87	0.00	15.15	100%
LX6985	8.23	61.60%	0.0%	61.6%	0.0%	37.50%	0.01600	60	5.07	5.07	4.87	116.81	21.32	0.00	13.52	100%
LX6662	8.21	55.90%	0.0%	55.9%	0.0%	43.08%	0.00200	830	4.59	4.59	7.62	182.84	33.37	0.00	10.65	100%
LX5113	7.58	61.40%	0.0%	61.4%	0.0%	38.25%	0.00040	150	4.65	4.65	0.28	6.70	1.22	0.00	12.17	100%
Lx4898	7.42	66.90%	0.0%	66.9%	0.0%	33.00%	0.00037	360	4.96	4.96	0.66	15.87	2.90	0.00	15.04	100%
EA-L3054	8.29	76.20%	0.0%	76.2%	0.0%	15.01%	0.00033	2500	6.32	6.32	5.21	125.08	22.83	0.00	42.09	100%
B50Y1	8.79	60.50%	0.0%	60.5%	0.0%	23.70%	0.05000	66	5.32	5.32	17.55	421.18	76.87	0.00	22.44	100%
DMF Blue	7.16	85.20%	0.0%	85.2%	0.0%	15.30%	0.00480	208	6.10	6.10	6.09	146.17	26.68	0.00	39.87	100%
DXX553	7.08	88.10%	0.0%	88.1%	0.0%	11.90%	0.00480	208	6.24	6.24	6.23	149.46	27.28	0.00	52.42	100%
SUBTOTAL											**17.55**	**421.18**	**76.87**	**0.00**		
SCP201																
F78WXA4349	9.28	65.50%	50.5%	15.0%	56.3%	31.60%	0.016	120	3.19	1.39	2.67	64.14	11.71	0.00	4.41	100%
F78WXR4345	8.46	74.10%	58.1%	16.0%	59.0%	30.20%	0.016	120	3.30	1.35	2.60	62.37	11.38	0.00	4.48	100%
F78W508	9.22	67.30%	52.4%	14.9%	58.0%	31.30%	0.016	120	3.27	1.37	2.64	63.30	11.55	0.00	4.39	100%
F78B501	8.41	75.00%	59.2%	15.8%	59.8%	29.70%	0.016	120	3.31	1.33	2.55	61.23	11.17	0.00	4.47	100%
F78L519	8.44	74.70%	59.1%	15.6%	59.9%	29.50%	0.016	120	3.28	1.32	2.53	60.67	11.07	0.00	4.46	100%
SUBTOTAL											**2.67**	**64.14**	**11.71**	**0.00**		
SCP301																
LX4897	7.71	62.80%	0.0%	62.8%	0.0%	36.75%	0.00007	700	4.84	4.84	0.24	5.69	1.04	0.00	13.18	100%
LX4896	7.81	63.50%	0.0%	63.5%	0.0%	35.92%	0.00007	700	4.96	4.96	0.24	5.83	1.06	0.00	13.81	100%
SUBTOTAL											**0.24**	**5.83**	**1.06**	**0.00**		
Potential Emissions											**20.46**	**491.16**	**89.64**	**0.00**		

METHODOLOGY

Coating usages in each area are mutually exclusive.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
SCP301 is an insignificant activity, because the segment has a potential VOC emissions of less than 3 lbs/hr and 15 lbs/day.

Appendix A: Emissions Calculations
HAPs Emissions
Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-26357-00022
Reviewer: Jeremy Palin
Date: April 7, 2008

Coating or Solvent	Consumption per unit	Maximum per hour	Annual Usage	Coating or Solvent Density	Annual Wt. of coating or solvent used	Xylene	Toluene	Lead	Formal-dehyde	Ethyl-benzene	Glycol Ethers	Triethyl-amine	Cobalt Compound	Chromium Compound	All HAPs
	gal/unit	unit/hr	gal/yr	lb/gal	lb/yr	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	
						tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
SCP101, SCP102 and SCP103															
LX7002	0.01600	60	8409.60	7.99	67,193	40.83%	8.33%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%	
						13.7185	2.7997	0.0000	0.0403	0.0000	0.0000	0.0000	0.0000	0.0000	16.558
LX6985	0.01600	60	8409.60	8.23	69,211	37.50%	16.67%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	
						12.9771	5.7677	0.0000	0.0058	0.0000	0.0000	0.0000	0.0000	0.0000	18.751
LX6662	0.00200	830	14541.60	8.21	119,387	19.17%	16.67%	0.00%	0.00%	0.83%	4.17%	0.00%	0.00%	0.00%	
						11.4412	9.9491	0.0000	0.0000	0.4974	2.4872	0.0000	0.0000	0.0000	24.375
LX5113	0.00040	150	525.60	7.58	3,984	10.00%	25.00%	0.00%	0.00%	0.00%	4.17%	0.00%	0.10%	0.10%	
						0.1992	0.4980	0.0000	0.0000	0.0000	0.0830	0.0000	0.0020	0.0020	0.784
LX4898	0.00037	360	1166.83	7.42	8,658	2.50%	16.67%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						0.1082	0.7215	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.830
EA-L3054	0.00033	2500	7227.00	8.29	59,912	22.26%	50.00%	3.48%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						6.6682	14.9780	1.0425	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	22.689
B50Y1	0.05000	66	28908.00	8.79	254,101	1.10%	50.00%	0.00%	0.00%	0.20%	0.00%	0.00%	0.00%	0.00%	
						1.3976	63.5253	0.0000	0.0000	0.2541	0.0000	0.0000	0.0000	0.0000	65.177
DMF BLUE	0.00480	208	8745.98	7.16	62,621	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000
DXX553	0.00480	208	8745.98	7.08	61,922	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						0.0000	3.0961	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	3.096
MEK				6.75	2,254	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000
SCP201															
F78WXA4349	0.01600	120	16819.20	9.28	156,082	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	1.67%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	7.8041	1.3007	0.0000	0.0000	9.105
F78WXR4345	0.01600	120	16819.20	8.46	142,290	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	1.67%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	7.8260	1.1858	0.0000	0.0000	9.012
F78W508	0.01600	120	16819.20	9.22	155,073	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	1.67%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	7.7537	1.2923	0.0000	0.0000	9.046
F78B501	0.01600	120	16819.20	8.41	141,449	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	1.67%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	7.0725	1.1788	0.0000	0.0000	8.251
F78L519	0.01600	120	16819.20	8.44	141,954	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	1.67%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	7.0977	1.1830	0.0000	0.0000	8.281
SCP301															
LX4897	0.00007	700	429.24	7.71	3,309	2.50%	16.67%	0.00%	0.00%	0.00%	4.17%	0.00%	0.00%	0.00%	
						0.0414	0.2758	0.0000	0.0000	0.0000	0.0689	0.0000	0.0000	0.0000	0.386
LX4896	0.00007	700	429.24	7.81	3,352	0.00%	16.67%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						0.0000	0.2794	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.279
Potential Air Toxics Emissions (tons/yr)						**13.76**	**63.80**	**1.04**	**0.04**	**0.50**	**10.38**	**1.30**	**0.00**	**0.00**	**90.82**

Total HAP emissions for the source are limited to 24.0 tons/year and single HAP emissions are limited to 9.0 tons/year. Therefore, the requirements of 326 IAC 2-7 don't appl

METHODOLOGY

All coatings reflect "as applied" by the applicator.

Annual Usage (ton/yr) = Usage rate (gal/hr) * 8,760 (hrs/yr) * Density (lb/gal) / 2000 (lb/ton)

Air Toxic Tons per Year = Annual Usage (tons/yr) * Weight % Air Toxic

Appendix A: Emissions Calculations
Grinding and Shot Peen Operations

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-26357-00022
Reviewer: Jeremy Palin
Date: April 7, 2008

Segment ID #	Amount of Dust Collected (lbs)	# of Hours Baghouse in Operation	Control Efficiency (%)	Uncontrolled Emissions		Controlled Emissions		Process Wt. Rate (lb/hr)	326 IAC 6-3 Limit (lb/hr)	Compliance (Y/N)
				(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)			
125X030 (GP101)	15,537	4,160	85.0%	4.39	19.25	1.72	7.53	546	1.72	Y
125X031 (GP102)	15,537	4,160	85.0%	4.39	19.25	1.72	7.53	546	1.72	Y
533X005 (GP103)	15,537	4,160	85.0%	4.39	19.25	1.72	7.53	546	1.72	Y
125X032 (GP104)	71,469	4,160	85.0%	20.21	88.53	4.77	20.89	2,510	4.77	Y
123H004 (GP105)	3,107	4,160	85.0%	0.88	3.85	0.58	2.54	109	0.58	Y
230X023 (GP201)	24,859	4,160	85.0%	7.03	30.79	2.35	10.29	873	2.35	Y
230X024 (GP 202)	3,107	4,160	85.0%	0.88	3.85	0.58	2.54	109	0.58	Y
			Total	**42.18**	**184.75**	**13.44**	**58.85**			

Methodology: Uncontrolled Emissions (lb/hr) were calculated by taking (Amount of Dust Collected / Control Efficiency) / (#of Hours Baghouse in Operation / 8760 Hours per Year) / 8760

Controlled Emissions are the allowable 326 IAC 6-3-2 emissions which are calculated with the following equation:

$E = 4.1 P ^{0.67}$ where: E is the allowable emissions in lb/hr.
P is the process weight rate in tons/hr.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-26357-00022
Reviewer: Jeremy Palin
Date: April 7, 2008

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
32.5	285.1

Facilities	**MMBtu/hr**
Plant 1 ovens and furnaces (Insignificant)	3.54
Plant 2 ovens and furnaces (Insignificant)	19.8
Plant 3 ovens and furnaces (Insignificant)	1
Plant 4 ovens and furnaces (Insignificant)	8.2
Plant 5 ovens and furnaces (Insignificant)	2.4
Total	**32.54**

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.27	1.08	0.09	14.25	0.78	11.97

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 100

HAPs Emissions

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-26357-00022
Reviewer: Jeremy Palin
Date: April 7, 2008

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.993E-04	1.710E-04	1.069E-02	2.565E-01	4.846E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	7.126E-05	1.568E-04	1.995E-04	5.416E-05	2.993E-04

Methodology is the same as page 5.

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

Appendix A: Emission Calculations
VOC
From Degreasing Operation

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-26357-00022
Reviewer: Jeremy Palin
Date: April 7, 2008

Insignificant Activity: Degreaser

Potential Emissions:

Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/day)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Crystal Clean Solvent	Millwright Department Solvent Degreaser	6.54	100.00%	0.00%	100.00%	0.00%	0.00%	0.500	0.14	3.27	0.60
Crystal Clean Solvent	Department 127 Parts Degreaser	6.54	100.00%	0.00%	100.00%	0.00%	0.00%	0.500	0.14	3.27	0.60
Crystal Clean Solvent	Department 135 Parts Degreaser	6.54	100.00%	0.00%	100.00%	0.00%	0.00%	0.500	0.14	3.27	0.60
Crystal Clean Solvent	Maintenance Department Degreaser	6.54	100.00%	0.00%	100.00%	0.00%	0.00%	0.500	0.14	3.27	0.60
Crystal Clean Solvent	Plant 3 Parts Degreaser	6.54	100.00%	0.00%	100.00%	0.00%	0.00%	0.500	0.14	3.27	0.60
Total Potential Emissions:									**0.68**	**16.35**	**2.98**

Note: Crystal Clean degreasing solvent does not contain any HAPs.

Methodology:
Potential VOC Pounds per Hour = Density (lb/gal) * Gal of Material (gal/day) / 24 hrs/day
Potential VOC Pounds per Day = Density (lb/gal) * Gal of Material (gal/day)
Potential VOC Tons per Year = Density (lb/gal) * Gal of Material (gal/day) * (365 days/yr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations
Particulater Matter (PM) Emissions

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-26357-00022
Reviewer: Jeremy Palin
Date: April 7, 2008

Insignificant Activities

Particulate Matter Emissions from wet grinder (125F041) (Plant 1 first floor)

PM/PM10:	0.03	gr/acf outlet x	100	acf/min x	60	min/hr /	7000	gr/lb x	4.38 ton/yr / lb/hr / 0.01 = **0.11 tons/yr (controlled)**
	where the baghouse control efficiency is listed at		99.00%						

Particulate Matter Emissions from two grinders (122F11 and 122F04) (Plant 1 Department 22)

PM/PM10:	0.03	gr/acf outlet x	100	acf/min x	60	min/hr /	7000	gr/lb x	4.38 ton/yr / lb/hr / 0.01 = **0.11 tons/yr (controlled)**
	where the baghouse control efficiency is listed at		99.90%						

Particulate Matter Emissions from shot peen unit (230H001) (Plant 2 Hot coil department)

PM/PM10:	0.03	gr/acf outlet x	900	acf/min x	60	min/hr /	7000	gr/lb x	4.38 ton/yr / lb/hr / 0.01 = **1.01 tons/yr (controlled)**
	where the baghouse control efficiency is listed at		99.90%						

Particulate Matter Emissions from shot peen unit (550H01) (Plant 5)

PM/PM10:	0.03	gr/acf outlet x	765	acf/min x	60	min/hr /	7000	gr/lb x	4.38 ton/yr / lb/hr / 0.01 = **0.86 tons/yr (controlled)**
	where the baghouse control efficiency is listed at		99.90%						

Particulate Matter Emissions from shot peen unit (550H02) (Plant 5)

PM/PM10:	0.03	gr/acf outlet x	935	acf/min x	60	min/hr /	7000	gr/lb x	4.38 ton/yr / lb/hr / 0.01 = **1.05 tons/yr (controlled)**
	where the baghouse control efficiency is listed at		99.90%						

Total: 3.15 tons/yr (controlled)

Methodology:
Uncontrolled PM/PM10 = grain loading (gr/acf outlet) * Flow rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * 4.38 (tons/yr / lb/hr) / (1- control effeciency %)

Appendix A: Emissions Calculations

Powder Coating Operations

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-26357-00022
Reviewer: Jeremy Palin
Date: April 7, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds of Powder used (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency *
Nylon Powder	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.18000	0.00	0.00	0.00	0.00	0.00	0.788	0.00	0%
								Potential Emissions		**0.00**	**0.00**	**0.00**	**0.79**		

* Transfer Efficiency is assumed to be 0% for worst case emissions.

	Control Efficiency PM	Controlled PM tons/yr
Total Controlled Potential Emissions:	99.70%	**0.002**

METHODOLOGY

Controlled Potential Emissions **0.002 (tons/yr)**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (lb/unit) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
Miscellaneous Solvent and Ink Usage

Company Name: **Matthew-Warren Incorporated**
Address City IN Zip: **500 E. Ottawa Street, Logansport, IN 46947**
FESOP Renewal No.: **017-26357-00022**
Reviewer: **Jeremy Palin**
Date: **April 7, 2008**

Solvents and Ink Usage (Insignificant Acitivity)

VOC Emissions

Operation	Chemical	Maximum Usage (lb/hr)	Percent VOC Evaporated (%)	Potential emissions (TPY)
Department 119, Segment 1 Ink application	Carco F-123	0.11	100.00%	0.482
Department 135, Section P Paint usage	Staining Purple DKG	6.85E-04	100.00%	0.003
Department 135, Section P Paint usage	Staining Red DNC	9.13E-04	100.00%	0.004
Department 135, Section P Paint usage	Staining White DW	6.85E-04	100.00%	0.003
Department 135, Section P Paint usage	Caterpilar Yellow A.D. Dip & Spin Davis Frost	2.85E-03	100.00%	0.012
			Total VOC	**0.504**

Notes:
Transfer efficiency is 100%, therefore there are no particulates emitted.