



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: December 23, 2009
RE: Karl Schmidt Unisia, Inc. / 003-26469-00064
FROM: Matthew Stuckey, Deputy 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, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

Karl Schmidt Unisia, Inc.
2425 Coliseum Boulevard South
Fort Wayne, Indiana 46803

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

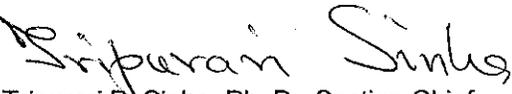
Operation Permit No.: T003-26469-00064	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 23, 2009 Expiration Date: December 23, 2014

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary aluminum foundry that manufactures pistons.

Source Address:	2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
Mailing Address:	2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
General Source Phone Number:	(219) 426-8081
SIC Code:	3361
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

- (a) one (1) evaporator, identified as EV1, with a maximum capacity of 0.75 MMBTU/hr and 3.75 gal/hr of oil/water mixture, constructed in 1992, and exhausting to stack 9; and
- (b) eight (8) engine test cells, all constructed in August 2001, each consisting of one (1) Electric Dyno and one (1) gasoline or diesel fuel fired Reciprocating Internal Combustion Engine, each engine has a maximum heat input rating of 1.1 million British thermal units per hour (MMBtu/hr) and a maximum power output rating of 450 horsepower (HP), each exhausting through one (1) stack (Stacks 1 through 8).

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (MMBtu/hr), including the following:
 - (1) one (1) natural gas-fired boiler, identified as Boiler #2, with a maximum heat input capacity of 8.4 million British thermal units per hour (MMBtu/hr), constructed in 1955;
 - (2) one (1) natural gas-fired boiler, identified as Boiler #3, with a maximum heat input capacity of 1.0 million British thermal units per hour (MMBtu/hr), constructed in August 1983;
 - (3) one (1) natural gas-fired boiler, identified as Boiler #5, with a maximum heat input capacity of 8.59 million British thermal units per hour (MMBtu/hr), constructed in 1955;

- (4) one (1) natural gas-fired boiler, identified as Boiler #7, with a maximum heat input capacity of 3.5 million British thermal units per hour (MMBtu/hr), constructed in 2001;
 - (5) one (1) natural gas-fired boiler, identified as Boiler #8, with a maximum heat input capacity of 2.5 million British thermal units per hour (MMBtu/hr), constructed in 2001;
 - (6) one (1) natural gas-fired boiler, identified as Boiler #9, with a maximum heat input capacity of 3.5 million British thermal units per hour (MMBtu/hr), constructed in 2001; and
 - (7) one (1) natural gas-fired boiler, identified as Boiler #10, constructed in 2001, with a maximum heat input capacity of 3.5 million British thermal units per hour (MMBtu/hr), constructed in 2001.
- (b) 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 three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (1) one (1) surface grinding operation, consisting of fifteen (15) surface grinders, constructed in 2003, with a maximum total throughput capacity of 800 pounds of processed metal per hour, with emissions controlled by one (1) baghouse;
- (c) The following facilities with emissions below the exemption threshold levels:
- (1) one (1) natural gas-fired reverberatory furnace, identified as M5, with a maximum heat input capacity of 3.1 MMBtu per hour and a maximum melt capacity of 800 pounds per hour; Note: M5 was previously identified as F20, one of the reverberatory furnaces not removed from the source;
 - (2) one (1) natural gas-fired reverberatory furnace, identified as M1, constructed in 2004, with a maximum heat input capacity of 1.85 MMBtu per hour and a maximum melt capacity of 1,000 pounds per hour;
 - (3) one (1) natural gas-fired melt furnace, identified as M4, constructed in April 2001, with a maximum heat input capacity of 5.5 MMBtu per hour and a maximum melt capacity of 2,500 pounds per hour;
 - (4) one (1) spray booth, identified as SB-1, with a maximum capacity of coating 3 molds per hour and 3 ladles per hour, using air atomization applicators, equipped with paper filters for particulate control and exhausting to the atmosphere;
 - (5) two (2) parts washing stations, each utilizing less than 145 gallons of solvent per twelve (12) months. One of the three (3) solvents used at the washing stations, identified as Safety Kleen 105 Solvent Recycled, contains 0.01% (100 ppm) of perchloroethylene;
 - (6) one (1) 1,000 gallon heated fixed roof ethanol storage tank with an annual throughput of 12,000 gallons or less;

- (7) two (2) coating operations for surface coating pistons, which includes a pre-washer, a natural gas fired dry off oven with a maximum heat input capacity of 0.4 million British thermal units (MMBtu) per hour, roller coating, silk screen coating application, and a natural gas-fired curing oven with a maximum heat input capacity of 1.0 MMBtu per hour; and
 - (8) two (2) phosphate pretreat lines, consisting of six (6) spray tanks connected to a Reverse Osmosis Halo System.
 - (9) one (1) natural gas-fired heat treat oven, with a maximum rated capacity of 1.2 million British thermal units (MMBtu) per hour, exhausting through one (1) stack.
- (d) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. These units also have potential PM, PM₁₀, and SO₂ emissions below insignificant thresholds:
- one (1) anodizing line, identified as Anodizing Line #3, processing a maximum of 480 pistons per hour, consisting of the following:
 - (A) one (1) covered electrolyte holding tank with a maximum capacity of 300 gallons;
 - (B) one (1) rectifier; and
 - (C) one (1) packed bed scrubber for control of sulfur dioxide and sulfuric acid mist emissions from the holding tank, exhausting through one (1) stack, SCR3, which exhausts inside the building.

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

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

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

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T003-26469-00064, is issued for a fixed term of five (5) 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, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7] [IC 13-17-12]

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 2-7-5(5)]

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 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 the "responsible official" as defined by 326 IAC 2-7-1(34). 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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (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 the "responsible official" 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 and Enforcement 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, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement
Branch)
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 and Enforcement 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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4(c)(9) 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 2-7 and any other applicable rules.
 - (g) 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.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by a "Responsible Officer" need only reference the date of the original report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T003-26469-00064 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(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 and Enforcement Branch, 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, 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 2-7 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 Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 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
Permit Administration and Support Section, 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 2-7-20(b),(c), or (e). 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 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Permit Administration and Support Section, 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(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 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

C.6 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 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 and Enforcement Branch, 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.8 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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 or ninety (90) days of initial start-up, whichever is later. 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 and Enforcement 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [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 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a); and

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2][326 IAC 2-3]

- (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 or ninety (90) days of initial start-up, whichever is later.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

- (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 and Enforcement Branch, 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) one (1) evaporator, identified as EV1, with a maximum capacity of 0.75 MMBTU/hr and 3.75 gal/hr of oil/water mixture, constructed in 1992, and exhausting to stack 9.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render 326 IAC 8-1-6 not applicable, the amount of oil charged to the evaporator minus the oil disposed of as waste shall be limited to 32,880 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limits VOC emissions from the evaporator to less than 25 tons per year so that the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) do not apply.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

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

D.1.3 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the amount of oil charge to the evaporator and the amount of oil disposed of as waste. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) eight (8) engine test cells, all constructed in August 2001, each consisting of one (1) Electric Dyno and one (1) gasoline or diesel fuel fired Reciprocating Internal Combustion Engine, each engine has a maximum heat input rating of 1.1 million British thermal units per hour (MMBtu/hr) and a maximum power output rating of 450 horsepower (HP), each exhausting through one (1) stack (Stacks 1 through 8).

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

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

D.2.1 PSD Minor Limit [326 IAC 2-2]

- (a) The total usage of gasoline and gasoline equivalents in the eight (8) engine test cells shall not exceed 50,253 gallons of gasoline per twelve (12) consecutive month period, with compliance determined at the end of each month, so that VOC and CO emissions are limited to less than 100 tons per year.
- (b) The total usage of diesel and diesel equivalents in the eight (8) engine test cells shall not exceed 327,814 gallons of diesel fuel per twelve (12) consecutive month period, with compliance determined at the end of each month, so that NOx emissions are limited to less than 100 tons per year.
- (c) For purposes of determining compliance, the following shall apply:
- (1) every 1,000 gallons of diesel fuel oil burned shall be equivalent to 33 gallons of gasoline based on CO emissions such that the total gallons of gasoline and gasoline equivalent input does not exceed the limit specified;
 - (2) every 1,000 gallons of gasoline burned shall be equivalent to 168.9 gallons of diesel fuel oil based on NOx emissions such that the total gallons of diesel fuel oil and diesel fuel oil equivalent input does not exceed the limit specified.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the eight (8) engine test cells.

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

D.2.2 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the fuel usage limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The usage of gasoline and gasoline equivalents, in gallons, in the eight (8) engine test cells each month;
 - (2) The usage of diesel and diesel equivalents, in gallons, in the eight (8) engine test cells each month; and

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

D.2.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (MMBtu/hr), including the following:
- (1) one (1) natural gas-fired boiler, identified as Boiler #2, with a maximum heat input capacity of 8.4 million British thermal units per hour (MMBtu/hr), constructed in 1955;
 - (2) one (1) natural gas-fired boiler, identified as Boiler #3, with a maximum heat input capacity of 1.0 million British thermal units per hour (MMBtu/hr), constructed in August 1983;
 - (3) one (1) natural gas-fired boiler, identified as Boiler #5, with a maximum heat input capacity of 8.59 million British thermal units per hour (MMBtu/hr), constructed in 1955;
 - (4) one (1) natural gas-fired boiler, identified as Boiler #7, with a maximum heat input capacity of 3.5 million British thermal units per hour (MMBtu/hr), constructed in 2001;
 - (5) one (1) natural gas-fired boiler, identified as Boiler #8, with a maximum heat input capacity of 2.5 million British thermal units per hour (MMBtu/hr), constructed in 2001;
 - (6) one (1) natural gas-fired boiler, identified as Boiler #9, with a maximum heat input capacity of 3.5 million British thermal units per hour (MMBtu/hr), constructed in 2001; and
 - (7) one (1) natural gas-fired boiler, identified as Boiler #10, constructed in 2001, with a maximum heat input capacity of 3.5 million British thermal units per hour (MMBtu/hr), constructed in 2001.

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

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

D.3.1 Particulate [326 IAC 6-2-3][326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-3(d) and 326 IAC 6-2-3(e) (Particulate Emission Limitations for Sources of Indirect Heating) the following particulate emission limits shall apply to boilers #2, #3, and #5:
- (1) particulate emissions from each of the 8.4 and 8.59 MMBtu per hour heat input boilers, referred to as Boiler #2 and Boiler #5, respectively, shall not exceed 0.8 pound per MMBtu heat input.
 - (2) particulate emissions from the 1.0 MMBtu per hour heat input boiler, referred to as Boiler #3, shall not exceed 0.6 pound per MMBtu of heat input.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each of the 3.5, 2.5, 3.5, and 3.5 MMBtu per hour heat input boilers, referred to as boilers #7, #8, #9, and #10, respectively, shall not exceed 0.45 pound per MMBtu of heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

where: P_t = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
 Q = Total source maximum operating capacity rating in MMBtu/hr heat input.
= 30.99 MMBtu/hr

SECTION D.4

FACILITY OPERATION CONDITIONS

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

(b) 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 three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

(1) one (1) surface grinding operation, consisting of fifteen (15) surface grinders, constructed in 2003, with a maximum total throughput capacity of 800 pounds of processed metal per hour, with emissions controlled by one (1) baghouse;

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

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

D.4.1 Particulate [326 IAC 6-3-2] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the surface grinding operations shall not exceed 2.22 pounds per hour when operating at a process weight rate of 800 pounds per hour. The pound per hour limitation was calculated using the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

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

D.4.2 Particulate Control

In order to comply with condition D.4.1, the baghouse for particulate control shall be in operation and control emissions from the surface grinding operations at all times that the surface grinding operations are in operation.

SECTION D.5

FACILITY OPERATION CONDITIONS

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

- (c) The following facilities with emissions below insignificant thresholds:
- (1) one (1) natural gas-fired reverberatory furnace, identified as M5, with a maximum heat input capacity of 3.1 MMBtu per hour and a maximum melt capacity of 800 pounds per hour; Note: M5 was previously identified as F20, one of the reverberatory furnaces not removed from the source;
 - (2) one (1) natural gas-fired reverberatory furnace, identified as M1, constructed in 2004, with a maximum heat input capacity of 1.85 MMBtu per hour and a maximum melt capacity of 1,000 pounds per hour;
 - (3) one (1) natural gas-fired melt furnace, identified as M4, constructed in April 2001, with a maximum heat input capacity of 5.5 MMBtu per hour and a maximum melt capacity of 2,500 pounds per hour;
 - (4) one (1) spray booth, identified as SB-1, with a maximum capacity of coating 3 molds per hour and 3 ladles per hour, using air atomization applicators, equipped with paper filters for particulate control and exhausting to the atmosphere;
 - (5) two (2) parts washing stations, each utilizing less than 145 gallons of solvent per twelve (12) months. One of the three (3) solvents used at the washing stations, identified as Safety Kleen 105 Solvent Recycled, contains 0.01% (100 ppm) of perchloroethylene;
 - (6) one (1) 1,000 gallon heated fixed roof ethanol storage tank with an annual throughput of 12,000 gallons or less;
 - (7) two (2) coating operations for surface coating pistons, which includes a pre-washer, a natural gas fired dry off oven with a maximum heat input capacity of 0.4 million British thermal units (MMBtu) per hour, roller coating, silk screen coating application, and a natural gas-fired curing oven with a maximum heat input capacity of 1.0 MMBtu per hour; and
 - (8) two (2) phosphate pretreat lines, consisting of six (6) spray tanks connected to a Reverse Osmosis Halo System;
 - (9) one (1) natural gas-fired heat treat oven, with a maximum rated capacity of 1.2 million British thermal units (MMBtu) per hour, exhausting through one (1) stack.
- (d) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. These units also have potential PM, PM10, and SO2 emissions below insignificant thresholds:
- one (1) anodizing line, identified as Anodizing Line #3, processing a maximum of 480 pistons per hour, consisting of the following:
- (A) one (1) covered electrolyte holding tank with a maximum capacity of 300 gallons;
 - (B) one (1) rectifier; and

- (C) one (1) packed bed scrubber for control of sulfur dioxide and sulfuric acid mist emissions from the holding tank, exhausting through one (1) stack, SCR3, which exhausts inside the building.

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

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

D.5.1 Particulate [326 IAC 6-3-2(e)]

- (a) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the reverberatory furnace, identified as M5, shall not exceed 2.22 pounds per hour when the furnace is operating at a process weight rate of 800 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) reverberatory furnace, identified as M1, shall not exceed 2.58 pounds per hour when the furnace is operating at a process weight rate of 1,000 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) melt furnace, identified as M4, shall not exceed 4.76 pounds per hour when the furnace is operating at a process weight rate of 2,500 pounds per hour.

The pounds per hour limitations above were calculated using the following equation:

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

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

D.5.2 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the spray booth (SB-1) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.5.3 Secondary Aluminum NESHAP [40 CFR 63, Subpart RRR]

The two (2) reverberatory furnaces M5 and M1 and the one (1) melt furnace (M4) shall only melt clean charge, customer returns, or internal scrap as defined under 40 CFR 63.1503. Therefore, the requirements of 40 CFR 63, Subpart RRR do not apply.

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the reverberatory furnaces, melt furnace, and spray booth and its control device.

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

D.5.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be

made of the overspray from the dry filters while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursion or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursion or Exceedances, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the dry filters and the presence of overspray on the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursion or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursion or Exceedances, shall be considered a deviation from this permit.

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

D.5.6 Record Keeping Requirements

- (a) To document compliance with Condition D.5.5, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Karl Schmidt Unisia, Inc.
Source Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
Mailing Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
Part 70 Permit No.: T003-26469-00064

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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Karl Schmidt Unisia, Inc.
Source Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
Mailing Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
Part 70 Permit No.: T003-26469-00064

This form consists of 2 pages

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- | |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime 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
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 AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Karl Schmidt Unisia, Inc.
Source Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
Mailing Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
Part 70 Permit No.: T003-26469-00064
Facility: Evaporator, EV1
Parameter: Net Oil Usage
Limit: The amount of oil charged to the evaporator minus the oil disposed of as waste shall be limited to 32,880 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Net Oil Usage This Month (gallons)	Net Oil Usage Previous 11 Months (gallons)	12 Month Total Net Oil Usage (gallons)
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 AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Karl Schmidt Unisia, Inc.
 Source Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
 Mailing Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
 Part 70 Permit No.: T003-26469-00064
 Facility: Eight (8) engine test cells
 Parameter: Gasoline Usage
 Limit: The total usage of gasoline and gasoline equivalents in the eight (8) engine test cells shall not exceed 50,253 gallons of gasoline per twelve (12) consecutive month period, with compliance determined at the end of each month. For purposes of determining compliance, every 1,000 gallons of diesel fuel oil burned shall be equivalent to 33 gallons of gasoline based on CO emissions such that the total gallons of gasoline and gasoline equivalent input does not exceed the limit specified.

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Net Oil Usage This Month (gallons)	Net Oil Usage Previous 11 Months (gallons)	12 Month Total Net Oil Usage (gallons)
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 AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Karl Schmidt Unisia, Inc.
 Source Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
 Mailing Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
 Part 70 Permit No.: T003-26469-00064
 Facility: Eight (8) engine test cells
 Parameter: Diesel Usage
 Limit: The total usage of diesel and diesel equivalents in the eight (8) engine test cells shall not exceed 327,814 gallons of diesel fuel per twelve (12) consecutive month period, with compliance determined at the end of each month. For purposes of determining compliance, every 1,000 gallons of gasoline burned shall be equivalent to 168.9 gallons of diesel fuel oil based on NOx emissions such that the total gallons of diesel fuel oil and diesel fuel oil equivalent input does not exceed the limit specified.

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Net Oil Usage This Month (gallons)	Net Oil Usage Previous 11 Months (gallons)	12 Month Total Net Oil Usage (gallons)
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 AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Karl Schmidt Unisia, Inc.
Source Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
Mailing Address: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
Part 70 Permit No.: T003-26469-00064

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

Page 1 of 2

<p>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".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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 Part 70 Operating Permit Renewal

Source Background and Description

Source Name: Karl Schmidt Unisia, Inc.
Source Location: 2425 Coliseum Boulevard South, Fort Wayne, Indiana 46803
County: Allen
SIC Code: 3361
Permit Renewal No.: T003-26469-00064
Permit Reviewer: Joe Sachse

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Karl Schmidt Unisia, Inc. relating to the operation of an aluminum foundry that manufactures pistons.

History

On April 28, 2008, Karl Schmidt Unisia, Inc. submitted an application to the OAQ requesting to renew its operating permit. Karl Schmidt Unisia, Inc. was issued a Part 70 Operating Permit Renewal on January 28, 2004.

Permitted Emission Units and Pollution Control Equipment

- (a) one (1) evaporator, identified as EV1, with a maximum capacity of 0.75 MMBTU/hr and 3.75 gal/hr of oil/water mixture, constructed in 1992, and exhausting to stack 9; and
- (b) eight (8) engine test cells, all constructed in August 2001, each consisting of one (1) Electric Dyno and one (1) gasoline or diesel fuel fired Reciprocating Internal Combustion Engine, each engine has a maximum heat input rating of 1.1 million British thermal units per hour (MMBtu/hr) and a maximum power output rating of 450 horsepower (HP), each exhausting through one (1) stack (Stacks 1 through 8).

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (MMBtu/hr), including the following:
 - (1) one (1) natural gas-fired boiler, identified as Boiler #2, with a maximum heat input capacity of 8.4 million British thermal units per hour (MMBtu/hr), constructed in 1955;
 - (2) one (1) natural gas-fired boiler, identified as Boiler #3, with a maximum heat input capacity of 1.0 million British thermal units per hour (MMBtu/hr), constructed in August 1983;
 - (3) one (1) natural gas-fired boiler, identified as Boiler #5, with a maximum heat input capacity of 8.59 million British thermal units per hour (MMBtu/hr), constructed in 1955;
 - (4) one (1) natural gas-fired boiler, identified as Boiler #7, with a maximum heat input capacity of 3.5 million British thermal units per hour (MMBtu/hr), constructed in 2001;
 - (5) one (1) natural gas-fired boiler, identified as Boiler #8, with a maximum heat input capacity of 2.5 million British thermal units per hour (MMBtu/hr), constructed in 2001;

- (6) one (1) natural gas-fired boiler, identified as Boiler #9, with a maximum heat input capacity of 3.5 million British thermal units per hour (MMBtu/hr), constructed in 2001; and
 - (7) one (1) natural gas-fired boiler, identified as Boiler #10, constructed in 2001, with a maximum heat input capacity of 3.5 million British thermal units per hour (MMBtu/hr), constructed in 2001.
- (b) 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 three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (1) one (1) surface grinding operation, consisting of fifteen (15) surface grinders, constructed in 2003, with a maximum total throughput capacity of 800 pounds of processed metal per hour, with emissions controlled by one (1) baghouse;
- (c) The following facilities with emissions below the exemption threshold levels:
- (1) one (1) natural gas-fired reverberatory furnace, identified as M5, with a maximum heat input capacity of 3.1 MMBtu per hour and a maximum melt capacity of 800 pounds per hour; Note: M5 was previously identified as F20, one of the reverberatory furnaces not removed from the source;
 - (2) one (1) natural gas-fired reverberatory furnace, identified as M1, constructed in 2004, with a maximum heat input capacity of 1.85 MMBtu per hour and a maximum melt capacity of 1,000 pounds per hour;
 - (3) one (1) natural gas-fired melt furnace, identified as M4, constructed in April 2001, with a maximum heat input capacity of 5.5 MMBtu per hour and a maximum melt capacity of 2,500 pounds per hour;
 - (4) one (1) spray booth, identified as SB-1, with a maximum capacity of coating 3 molds per hour and 3 ladles per hour, using air atomization applicators, equipped with paper filters for particulate control and exhausting to the atmosphere;
 - (5) two (2) parts washing stations, each utilizing less than 145 gallons of solvent per twelve (12) months. One of the three (3) solvents used at the washing stations, identified as Safety Kleen 105 Solvent Recycled, contains 0.01% (100 ppm) of perchloroethylene;
 - (6) one (1) 1,000 gallon heated fixed roof ethanol storage tank with an annual throughput of 12,000 gallons or less;
 - (7) two (2) coating operations for surface coating pistons, which includes a pre-washer, a natural gas fired dry off oven with a maximum heat input capacity of 0.4 million British thermal units (MMBtu) per hour, roller coating, silk screen coating application, and a natural gas-fired curing oven with a maximum heat input capacity of 1.0 MMBtu per hour;
 - (8) two (2) phosphate pretreat lines, consisting of six (6) spray tanks connected to a Reverse Osmosis Halo System; and
 - (9) one (1) natural gas-fired heat treat oven, with a maximum rated capacity of 1.2 million British thermal units (MMBtu) per hour, exhausting through one (1) stack.

- (d) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. These units also have potential PM, PM₁₀, and SO₂ emissions below insignificant thresholds:

one (1) anodizing line, identified as Anodizing Line #3, processing a maximum of 480 pistons per hour, consisting of the following:

- (A) one (1) covered electrolyte holding tank with a maximum capacity of 300 gallons;
- (B) one (1) rectifier; and
- (C) one (1) packed bed scrubber for control of sulfur dioxide and sulfuric acid mist emissions from the holding tank, exhausting through one (1) stack, SCR3, which exhausts inside the building.

Emission Units and Pollution Control Equipment Removed From the Source

- (a) natural gas-fired combustion sources with heat input equal to or less than ten million British thermal units per hour, including the following:
- (1) nine (9) natural gas-fired reverberatory furnaces, each with a maximum melt capacity of 800 pounds per hour, referred to as F4 - F5, F11 - F12, F17 - F18, and F21 - F23. Furnaces F4 - F5, F17 - F18, and F22 each have a maximum heat input capacity of 2.4 million British thermal units (MMBtu) per hour. Furnaces F11 - F12 and F21 each have a maximum heat input capacity of 3.1 MMBtu per hour. Furnace F23 has a maximum heat input capacity of 3.0 MMBtu per hour;
 - (2) one (1) natural gas-fired reverberatory furnace, with a maximum heat input capacity of 4.6 MMBtu per hour, and a maximum melt capacity of 2,000 pounds per hour, identified as F14;
 - (3) one (1) dry hearth furnace, fueled by natural gas only, with a heat input capacity of 5.1 million British thermal units per hour, and a charging capacity of 2,000 pounds per hour, identified as F13;
 - (4) forty-eight (48) natural gas-fired crucible furnaces, each with a maximum melt capacity of 200 pounds per hour, and each with a maximum heat input capacity of 0.5 MMBtu per hour, referred to as C1a - C48a;
 - (5) eleven (11) natural gas-fired crucible furnaces, each with a maximum melt capacity of 400 pounds per hour, and each with a maximum heat input capacity of 1.0 MMBtu per hour, identified as C1b - C11b;
 - (6) two (2) natural gas-fired crucible furnaces, each with a maximum melt capacity of 600 pounds per hour, and each with a maximum heat input capacity of 1.0 MMBtu per hour, identified as C1c and C2c;
 - (7) two (2) parts washing stations each utilizing less than 145 gallons of solvent per twelve (12) months. One of the solvents of the three (3) solvents used at the washing stations, identified as Safety Kleen 105 Solvent Recycled, contains 0.01% (100 ppm) of perchloroethylene;

Existing Approvals

Since the issuance of the Part 70 Operating Permit No. T003-15163-00064 on January 28, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. (003-24261-00064) issued on February 20, 2007;
- (b) Exemption No. (003-21848-00064) issued on November 28, 2005;
- (c) Administrative Amendment No. (003-20014-00064) issued on November 1, 2004;
- (d) Administrative Amendment No. (003-18876-00064) issued on June 4, 2004; and
- (e) Administrative Amendment No. (003-18667-00064) issued on February 16, 2004

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Allen County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, 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.

¹Unclassifiable 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, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) 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. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Allen County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Allen County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants: SO₂, CO, PM₁₀, NO₂, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Since this source is classified as a secondary metal production plant, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (e) **Fugitive Emissions**
Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	86.04
PM ₁₀	62.80
SO ₂	43.78
VOC	281.76
CO	5,027.69
NO _x	683.85

HAPs	tons/year
single HAP	< 10
Total HAPs	< 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC, CO, and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is a minor source under Section 112 of the Clean Air Act.

- (d) Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-7 (Secondary Metal Production Plant), fugitive emissions are counted toward the determination of Part 70 applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NOx	HAPs
Evaporator	0.00	0.00	0.00	24.00	0.00	0.00	0.00
8 Engine Test Cells	6.97	6.97	6.51	3.72	99.00	99.00	0.00
Reverberatory Furnace M1	0.04	0.28	0.00	0.44	0.00	0.00	0.00
Reverberatory Furnace M4	0.10	0.71	0.00	1.10	0.00	0.00	0.00
Reverberatory Furnace M5	0.03	0.23	0.00	0.35	0.00	0.00	0.00
7 Boilers	0.30	1.00	0.10	0.70	11.40	13.60	0.256
Combustion Units	0.10	0.40	0.00	0.30	4.80	5.70	0.097
Spray Booth SB-1	8.91	8.91	0.00	0.62	0.00	0.00	neg
Grinding and Machining	4.50	4.50	0.00	0.00	0.00	0.00	0.00
Total	20.95	23.00	6.61	31.23	115.20	118.30	0.35
Major Source Threshold	100	100	100	100	100	100	25

- (a) This existing stationary source is major for PSD because the emissions of at least one regulated pollutant are greater than one hundred (>100) tons per year, and it is one of the twenty-eight (28) listed source categories.

- (b) Fugitive Emissions
Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Although each of the eight (8) engine test cells have potential CO emissions greater than the major source threshold of 100 tons per year, they are not subject to an emission limitation or standard for CO and they do not use a control device to comply with a CO emission limitation. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to any of the existing units as part of this Part 70 permit renewal.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart RRR, because pursuant to 40 CFR 63.1500 (d), the requirements of this subpart do not apply to manufacturers of aluminum die castings, aluminum foundries, or aluminum extruders that melt no materials other than clean charge and materials generated within the facility; and that also do not operate a thermal chip dryer, sweat furnace or scrap dryer/delacquering kiln/decoating kiln. This source, which is an area source of HAPs, not a major source of HAPs, only melts clean charge and does not operate a thermal chip dryer, sweat furnace or scrap dryer/delacquering kiln/decoating kiln, therefore, the requirements of this rule do not apply.
- (e) The eight (8) engine test cells are not subject to the NESHAP, 40 CFR 63, Subpart P, "National Emission Standard for Hazardous Air Pollutants for Engine Test Cells/Stands" because this source does not have potential single HAP emissions of equal to or greater than 10 tons per year or potential emissions of any combination of HAPs of equal to or greater than 25 tons per year, therefore, it is not a major source of HAPs. This rule only applies to engine test cells that are located at a major source of HAP emissions.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD)

This source is a secondary aluminum production plant. Therefore, this source is one of the 28 listed source categories under 326 IAC 2-21(p)(1).

On August 20, 2001, the source was operating under a FESOP and was issued SPR 003-13612-00064 for the eight (8) engine test cells. Since potential limited emissions from the addition of the engine test cells caused the source wide emissions to exceed 100 tons per year, the requirements of 326 IAC 2-7 (Part 70 Permit Program) applied to this source. The source submitted a Part 70 permit application and was issued Part 70 Operating Permit No. T003-15163-00064 on January 28, 2004. The source limited the total usage of fuel in the eight (8) engine test cells to 50,253 gallons of gasoline and gasoline equivalents per twelve (12) consecutive month period, with compliance determined at the end of each month, and 327,814 gallons of diesel and diesel equivalents per twelve (12) consecutive month period, with compliance determined at the end of each month. This limited emissions of NO_x, VOC, and CO from the eight (8) engine test cells to less than 100 tons per year so that the installation of the engine test cells was a minor PSD modification.

Also in Part 70 Operating Permit No. T003-15163-00064, issued on January 28, 2004, the source installed a surface grinding operation consisting of 15 grinders. The uncontrolled potential to emit of the surface grinding operation is 29.80 tons per year, which is more than the 25 tons per year significance level for particulate matter. Therefore, the PM emissions from the surface grinding operation are limited to less than 5.70 pounds per hour. Compliance with this limit shall limit the PTE of the surface grinding operation to less than 25 tons per year and render 326 IAC 2-2 not applicable to the surface grinding operation. The surface grinding operation is also limited by 326 IAC 6-3-2 (see State Rule Applicability - Individual Facilities for more information) and is a more stringent limit, therefore satisfying the 326 IAC 2-2 limit.

After addition of the engine test cells, the potential source wide emissions of CO and NO_x were greater than 100 tons per year. Therefore, this source became a major PSD source.

On June 4, 2004, the source was issued Administrative Amendment No. 003-18876-00064 for the addition of 4 parts washing stations, which were considered insignificant activities, and were less than the PSD major modification thresholds.

On November 1, 2004, the source was issued Administrative Amendment No. 003-20014-00064 to replace reverberatory furnace M1 with a reverberatory furnace with a lower maximum melt capacity and lower maximum heat capacity, also identified as M1. This unit was considered an insignificant activity and was less than the PSD major modification thresholds.

On November 28, 2005, the source was issued Exemption No. 003-21848-00064 for the addition of a coating operation, cure oven, and phosphate pretreatment line, which were all considered insignificant activities, and were less than the PSD major modification thresholds.

On February 20, 2007, the source was issued Administrative Amendment No. 003-24261-00064 for the addition of the 1,000 gallon ethanol storage tank, which was considered an insignificant activity and was less than the PSD major modification thresholds.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. Therefore, the next emission statement for this source must be submitted by July 1, 2010. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

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

State Rule Applicability – Individual Facilities

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

- (a) Particulate from the spray booth, identified as SB-1, shall be controlled by dry particulate filters, and the Permittee shall operate the dry particulate filters in accordance with manufacturer's specifications.

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

The particulate from the source shall be limited as follows:

- (a) The particulate emissions from the one (1) reverberatory furnaces, identified as M5, shall not exceed the allowable emission rate of 2.22 pounds per hour, based on a process weight rate of 800 pounds per hour.
- (b) The particulate emissions from the one (1) melt furnace, identified as M1, shall not exceed the allowable emission rate of 2.58 pounds per hour, based on a process weight rate of 1,000 pounds per hour.
- (c) The particulate emissions from the one (1) melt furnace, identified as M4, shall not exceed the allowable emission rate of 4.76 pounds per hour, based on a process weight rate of 2,500 pounds per hour.
- (d) The particulate emissions from the surface grinding operations shall not exceed the allowable emission rate of 2.22 pounds per hour, based on a process weight rate of 800 pounds per hour.

The above listed particulate limits were calculated based on the following equation:

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:

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

The potential particulate emissions from each reverberatory and melt furnace at this source are less than the allowable emissions pursuant to this rule, therefore, these units are in compliance with this rule.

326 IAC 6-2-3(a) (Particulate Emission Limitations for Sources of Indirect Heating)

(a) The three (3) boilers, with maximum heat input capacities of 8.4, 1.0, and 8.59 MMBtu per hour, referred to as Boiler #2, Boiler #3, and Boiler #5, respectively, are subject to the requirements of 326 IAC 6-2-3 because these units are indirect heating facilities that were in operation prior to September 21, 1983.

Pursuant to this rule, particulate emissions from these units shall be limited by the following equation:

$$P_t = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where:

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

P_t = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet.

Since the stack heights of each of the boilers are different, the average stack height was calculated using the following equation in 326 IAC 6-2-3(a):

$$h = \frac{\sum_{i=1}^N H_i \times pa_i \times Q}{\sum_{i=1}^N pa_i \times Q} = 39.1 \text{ ft.}$$

where:

pa = the actual controlled emission rate in lb/MMBtu using the AP-42 emission factor.

For the three (3) boilers, P_t is calculated as follows:

$$P_t = \frac{50 \times 0.67 \times 39.1}{76.5 \times 17.99^{0.75} \times 6^{0.25}} = 1.25 \text{ lb/MMBtu}$$

However, pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 lb/MMBtu heat input. Therefore, the allowable particulate matter emissions from Boiler #2 and #5, which were constructed in 1955, shall not exceed 0.8 lb/MMBtu heat input.

Pursuant to 326 IAC 6-2-3(e), particulate emissions from any facility used for indirect heating purposes which has 250 MMBtu per hour heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb/MMBtu heat input. Therefore, the allowable particulate matter emissions from Boiler #3, which was constructed in 1983, shall not exceed 0.6 lb/MMBtu heat input.

The potential PM emissions from Boilers #2, #3, and #5 are each 0.002 lb/MMBtu heat input. Therefore, these boilers are in compliance with this rule.

- (b) The four (4) boilers, with maximum heat input capacities of 3.5, 2.5, 3.5, and 3.5 MMBtu per hour, referred to as Boiler #7, Boiler #8, Boiler #9, and Boiler #10, respectively, are subject to the requirements of 326 IAC 6-2-4 since they are indirect heating facilities that were constructed after September 21, 1983.

Pursuant to this rule, particulate emissions from these units shall be limited by the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

where: P_t = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
 Q = Total source maximum operating capacity rating in MMBtu/hr heat input.
= 30.99 MMBtu/hr

Based on the above equation, particulate emissions from each of Boilers #7, #8, #9, and #10 shall be limited to 0.45 pound per MMBtu heat input.

The potential PM emissions from each boiler is 0.002 lb/MMBtu heat input. Therefore, these units are in compliance with 326 IAC 6-2-4.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The eight (8) engine test cells are not subject to the requirements of this rule because potential SO₂ emissions from each engine test cell are less than 25 tons per year or 10 pounds per hour. Each test cell is operated independently of the others, and therefore each engine test cell is a separate facility.

Potential SO₂ emissions from each of the boilers and furnaces at this source are less than 25 tons per year. Therefore, they are not subject to this rule.

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

- (a) The eight (8) engine test cells are not subject to the requirements of this rule because potential VOC emissions from each engine test cell are less than 25 tons per year. Each test cell is operated independently of the others, and therefore each engine test cell is a separate facility.

- (b) Potential VOC emissions from the melting of the aluminum in the reverberatory, from combustion, and from pouring/casting are less than 25 tons per year. Therefore, these units are not subject to this rule.
- (c) The uncontrolled VOC potential emissions from the evaporator, constructed in 1992, are greater than twenty-five (25) tons per year. Pursuant to FESOP F003-5869-00064, the amount of oil charged to the evaporator minus the oil disposed of as waste shall be limited to 32,880 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limits VOC emissions from the evaporator to less than 25 tons per year so that this rule does not apply to the evaporator.

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

The surface coating operation for surface coating pistons is not subject to this rule because it was constructed after November 1, 1980 and prior to July 1, 1990 and the potential VOC emissions are less than 25 tons per year.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The aqueous parts washers and board washers are not subject to this rule since they do not use organic solvents.

Testing Requirements

In prior permits, testing was required for the melting operations to demonstrate compliance with the PM limits pursuant to 326 IAC 6-3-2 and to render the requirements of 326 IAC 2-2 (PSD) not applicable. The next testing was required before June 2010. Karl Schmidt Unisia shall remove all melting operations by December 31, 2009. Therefore, the testing requirement has been removed from the renewal permit.

Testing is not required for the engine test cells because emissions are low and uncontrolled.

Testing is not required for the evaporator because compliance with the VOC emission limit can be determined through record keeping and reporting of the oil usage.

Compliance Determination and Monitoring Requirements

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

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

The compliance monitoring requirements applicable to this source are as follows:

The following table applies to the dry filters for the spray booth, identified as SB₁;

Emission Units	Frequency	Monitoring
Dry filters	Daily	Inspection shall be perform to verify the placement, integrity, and particle loading of the dry media filters.
	Weekly	Observation shall be made of the particulate from the blowchambers stack to monitor the performace of the dry media filters
	Monthly	Inspection shall be performed of the particulate emissions from the stack and the presence of particulate on the rooftops and the nearby ground.

These monitoring conditions are necessary because the baghouse for the fifteen (15) surface grinders and the dry filters for the spray booth must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 28, 2008.

Conclusion

The operation of this aluminum foundry that manufactures pistons shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T003-26469-00064.

**Appendix A: Emissions Calculations
Emission Summary**

Source Name: Karl Schmidt Unisia, Inc.

Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803

Permit Number: T003-26469-00064

Permit Reviewer: Joe Sachse

Date: 15-Oct-09

Uncontrolled Potential to Emit

	PM (tons/yr)	PM₁₀ (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit							
Evaporator**	0.00	0.00	0.00	90.00	0.00	0.00	0.00
8 Engine Test Cells	46.76	46.76	43.68	188.25	5011.49	664.55	0.00
Reverb Fur. M1	0.04	0.28	0.00	0.44	0.00	0.00	0.00
Reverb Fur. M4	0.10	0.71	0.00	1.10	0.00	0.00	0.00
Reverb Fur. M5	0.03	0.23	0.00	0.35	0.00	0.00	0.00
7 Boilers	0.30	1.00	0.10	0.70	11.40	13.60	0.256
Combustion Units	0.10	0.40	0.00	0.30	4.80	5.70	0.097
Spray Booth SB-1	8.91	8.91	0.00	0.62	0.00	0.00	neg
Grinding and Machining	29.80	4.51 (2.98)*	0.00	0.00	0.00	0.00	0.00
Total Emissions	86.04	62.80	43.78	281.76	5027.69	683.85	Single HAP <10 Combined HAPs < 25

Note: ** Uncontrol and limited emissions is based on FESOP No. 003-5869-00064, issued on 12/9/1996

* The more conservative uncontrolled PTE for PM₁₀ is used in calculating the total PTE.

**Appendix A: Emissions Calculations
Emission Summary**

Source Name: Karl Schmidt Unisia, Inc.

Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803

Permit Number: T003-26469-00064

Permit Reviewer: Joe Sachse

Date: 15-Oct-09

Limited Potential to Emit

	PM (tons/yr)	PM₁₀ (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit							
Evaporator**	0.00	0.00	0.00	24.00	0.00	0.00	0.00
8 Engine Test Cells	6.97	6.97	6.51	3.72	99.00	99.00	0.00
Reverb Fur. M1	0.04	0.28	0.00	0.44	0.00	0.00	0.00
Reverb Fur. M4	0.10	0.71	0.00	1.10	0.00	0.00	0.00
Reverb Fur. M5	0.03	0.23	0.00	0.35	0.00	0.00	0.00
7 Boilers	0.30	1.00	0.10	0.70	11.40	13.60	0.256
Combustion Units	0.10	0.40	0.00	0.30	4.80	5.70	0.097
Spray Booth SB-1	8.91	8.91	0.00	0.62	0.00	0.00	neg
Grinding and Machining	4.50	4.50	0.00	0.00	0.00	0.00	0.00
Total Emissions	20.95	23.00	6.61	31.23	115.20	118.30	Single HAP <10 Combined HAPs < 25

Note: ** Uncontrol and limited emissions is based on FESOP No. 003-5869-00064, issued on 12/9/1996

**Appendix A: Emission Calculations
Internal Combustion Engine Testing
Reciprocating**

Source Name: Karl Schmidt Unisia, Inc.
Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803
Permit Number: T003-26469-00064
Permit Reviewer: Joe Sachse
Date: 15-Oct-09

Emissions calculated based on fuel usage

Maximum Diesel Fuel Usage Per Engine Test Cell (gal/yr) =	275064.0
Limited Diesel Fuel Usage For All Engine Test Cells (gal/yr) =	327814.6
Maximum Gasoline Fuel Usage Per Engine Test Cell (gal/yr) =	317988.0
Limited Gasoline Fuel Usage For All Engine Test Cells (gal/yr) =	50253.8

	Pollutant					
	PM*	PM ₁₀ *	SO ₂	NO _x	VOC	CO
Diesel Combustion Emission Factor in lb/1000 gal	42.5	42.5	39.7	604.0	49.3	130.0
Gasoline Combustion Emission Factor in lb/1000 gal	6.47	6.2	5.31	102.0	148.0	3940.0
Diesel Combustion						
Engine Test Cell #1 Potential Emissions in tons/yr	5.85	5.85	5.46	83.07	6.78	17.88
Engine Test Cell #2 Potential Emissions in tons/yr	5.85	5.85	5.46	83.07	6.78	17.88
Engine Test Cell #3 Potential Emissions in tons/yr	5.85	5.85	5.46	83.07	6.78	17.88
Engine Test Cell #4 Potential Emissions in tons/yr	5.85	5.85	5.46	83.07	6.78	17.88
Engine Test Cell #5 Potential Emissions in tons/yr	5.85	5.85	5.46	83.07	6.78	17.88
Engine Test Cell #6 Potential Emissions in tons/yr	5.85	5.85	5.46	83.07	6.78	17.88
Engine Test Cell #7 Potential Emissions in tons/yr	5.85	5.85	5.46	83.07	6.78	17.88
Engine Test Cell #8 Potential Emissions in tons/yr	5.85	5.85	5.46	83.07	6.78	17.88
Total Potential Emissions in tons/yr	46.76	46.76	43.68	664.55	54.24	143.03
Gasoline Combustion						
Engine Test Cell #1 Potential Emissions in tons/yr	1.03	0.99	0.84	16.22	23.53	626.44
Engine Test Cell #2 Potential Emissions in tons/yr	1.03	0.99	0.84	16.22	23.53	626.44
Engine Test Cell #3 Potential Emissions in tons/yr	1.03	0.99	0.84	16.22	23.53	626.44
Engine Test Cell #4 Potential Emissions in tons/yr	1.03	0.99	0.84	16.22	23.53	626.44
Engine Test Cell #5 Potential Emissions in tons/yr	1.03	0.99	0.84	16.22	23.53	626.44
Engine Test Cell #6 Potential Emissions in tons/yr	1.03	0.99	0.84	16.22	23.53	626.44
Engine Test Cell #7 Potential Emissions in tons/yr	1.03	0.99	0.84	16.22	23.53	626.44
Engine Test Cell #8 Potential Emissions in tons/yr	1.03	0.99	0.84	16.22	23.53	626.44
Total Potential Emissions in tons/yr	8.23	7.89	6.75	129.74	188.25	5011.49
Total Worst Case Potential Emissions in tons/yr	46.76	46.76	43.68	664.55	188.25	5011.49
Total Limited Emissions in tons/yr	6.97	6.97	6.51	99.00	3.72	99.00

Methodology

Potential Diesel Throughput (gal/yr) = 31.4 gal/hr * 8760 hr/yr
 Potential Gasoline Throughput (gal/yr) = 36.3 gal/hr * 8760 hr/yr

Emission Factors are from FIRE version 6.23, SCC 2-04-004-01, 2-04-004-02, Engine Testing

Emission (tons/yr) = [Potential Throughput (gal/yr) / (1000 gal/kgal) x Emission Factor (lb/kgal)] / (2,000 lb/ton)

*PM emission factors are assumed to be equivalent to PM₁₀ emission factors. All PM is assumed to be less than or equal to 1 micron.

**Appendix A: Emission Calculations
Internal Combustion Engine Testing
Reciprocating**

Source Name: Karl Schmidt Unisia, Inc.
Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803
Permit Number: T003-26469-00064
Permit Reviewer: Joe Sachse
Date: 15-Oct-09

Fuel Usage Limitations based on NOx Emissions

Fuel Oil: Diesel

$$\frac{99.00 \text{ tons NOx/year limited}}{664.55 \text{ tons NOx/year potential}} * 2200.51 \frac{\text{Kgals}}{\text{year potential}} = 327.81 \frac{\text{Kgals}}{\text{year limited}}$$

Fuel Oil: Gasoline

$$\frac{99.00 \text{ tons NOx/year limited}}{129.74 \text{ tons NOx/year potential}} * 2543.90 \frac{\text{Kgals}}{\text{year potential}} = 1941.18 \frac{\text{Kgals}}{\text{year limited}}$$

Fuel Usage Limitations based on VOC Emissions

Fuel Oil: Gasoline

$$\frac{99.00 \text{ tons VOC/year limited}}{188.25 \text{ tons VOC/year potential}} * 2543.90 \frac{\text{Kgals}}{\text{year potential}} = 1337.84 \frac{\text{Kgals}}{\text{year limited}}$$

Fuel Usage Limitations based on CO Emissions

Fuel Oil: Diesel

$$\frac{99.00 \text{ tons CO/year limited}}{143.03 \text{ tons CO/year potential}} * 2200.51 \frac{\text{Kgals}}{\text{year potential}} = 1523.08 \frac{\text{Kgals}}{\text{year limited}}$$

Fuel Oil: Gasoline

$$\frac{99.00 \text{ tons CO/year limited}}{5011.49 \text{ tons CO/year potential}} * 2543.90 \frac{\text{Kgals}}{\text{year potential}} = 50.25 \frac{\text{Kgals}}{\text{year limited}}$$

Fuel equivalence limit for diesel based on CO emissions from gasoline

$$\frac{143.03 \text{ diesel potential emissions (ton/yr)}}{2200.51 \text{ diesel potential usage (kgal/yr)}} / \frac{5011.49 \text{ gasoline potential emissions (ton/yr)}}{2543.90 \text{ gasoline potential usage (kgal/yr)}} = 0.0330 \frac{\text{Kgal gasoline burned}}{\text{Kgal diesel burned}}$$

Fuel equivalence limit for gasoline based on NOx emissions from diesel

$$\frac{129.74 \text{ gasoline potential emissions (ton/yr)}}{2543.90 \text{ gasoline potential usage (kgal/yr)}} / \frac{664.55 \text{ diesel potential emissions (ton/yr)}}{2200.51 \text{ diesel potential usage (kgal/yr)}} = 0.1689 \frac{\text{Kgal diesel burned}}{\text{Kgal gasoline burned}}$$

**Appendix A: Emission Calculations
Reverberatory Furnace M1**

Source Name: Karl Schmidt Unisia, Inc.
Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803
Permit Number: T003-26469-00064
Permit Reviewer: Joe Sachse
Date: 15-Oct-09

Process	Rate (tons/hr)	Pollutant	Ef (lb/ton)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
Reverb Furnace MI	0.5	PM	0.019	0.04	0.04	none	none
		PM-10	0.13	0.28	0.28	none	none
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.20	0.44	0.44		
		CO	0.00	0.00	0.00		

Methodology

Uncontrolled Emissions = Capacity (tons/hr)*Emission Factor (lb/ton)*8760hrs/yr *1ton/2000lb

Controlled Emissions = Uncontrolled Emissions*(1- Control Efficiency)

Emission Factor based on FIRE 6.23 SCC# 3-04-001-03

*** Note: PM and PM₁₀ emission factors for reverberatory furnaces were based on approved stack test results from test performed in January 18, 2000 on Furnace #14.

**Appendix A: Emission Calculations
Reverberatory Furnace M4**

Source Name: Karl Schmidt Unisia, Inc.
Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803
Permit Number: T003-26469-00064
Permit Reviewer: Joe Sachse
Date: 15-Oct-09

Process	Rate (tons/hr)	Pollutant	Ef (lb/ton)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
Reverb Furnace M4	1.25	PM*	0.019	0.10	0.10	none	none
		PM-10*	0.13	0.71	0.71	none	none
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.20	1.10	1.10		
		CO	0.00	0.00	0.00		

Methodology

Uncontrolled Emissions = Capacity (tons/hr)*Emission Factor (lb/ton)*8760hrs/yr *1ton/2000lb

Controlled Emissions = Uncontrolled Emissions*(1- Control Efficiency)

Emission Factor based on FIRE 6.23 SCC# 3-04-001-03

*** Note: PM and PM₁₀ emission factors for reverberatory furnaces were based on approved stack test results from test performed in January 18, 2000 on Furnace #14.

**Appendix A: Emission Calculations
Reverberatory Furnace M5**

Source Name: Karl Schmidt Unisia, Inc.
Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803
Permit Number: T003-26469-00064
Permit Reviewer: Joe Sachse
Date: 15-Oct-09

Process	Rate (tons/hr)	Pollutant	Ef (lb/ton)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
Reverb Furnace M5	0.4	PM*	0.019	0.03	0.03	none	none
		PM-10*	0.13	0.23	0.23	none	none
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.20	0.35	0.35		
		CO	0.00	0.00	0.00		

Methodology

Uncontrolled Emissions = Capacity (tons/hr)*Emission Factor (lb/ton)*8760hrs/yr *1ton/2000lb

Controlled Emissions = Uncontrolled Emissions*(1- Control Efficiency)

Emission Factor based on FIRE 6.23 SCC# 3-04-001-03

*** Note: PM and PM₁₀ emission factors for reverberatory furnaces were based on approved stack test results from test performed in January 18, 2000 on Furnace #14.

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

Source Name: Karl Schmidt Unisia, Inc.
Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803
Permit Number: T003-26469-00064
Permit Reviewer: Joe Sachse
Date: 15-Oct-09

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

30.99

271.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM ₁₀ *	SO ₂	NO _x	VOC	CO
Potential Emission in tons/yr	1.9	7.6	0.6	100.0 **see below	5.5	84.0
	0.3	1.0	0.1	13.6	0.7	11.4

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x 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

See page 2 for HAPs emissions calculations.

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

Source Name: Karl Schmidt Unisia, Inc.
Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803
Permit Number: T003-26469-00064
Permit Reviewer: Joe Sachse
Date: 15-Oct-09

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.850E-04	1.629E-04	1.018E-02	2.443E-01	4.615E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.787E-05	1.493E-04	1.900E-04	5.158E-05	2.850E-04

Methodology is the same as page 9.

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: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Combustion Units**

Source Name: Karl Schmidt Unisia, Inc.
Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803
Permit Number: T003-26469-00064
Permit Reviewer: Joe Sachse
Date: 15-Oct-09

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

13.1

114.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM ₁₀ *	SO ₂	NO _x	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.4	0.0	5.7	0.3	4.8

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x 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

See page 2 for HAPs emissions calculations.

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

Source Name: Karl Schmidt Unisia, Inc.
Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803
Permit Number: T003-26469-00064
Permit Reviewer: Joe Sachse
Date: 15-Oct-09

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.200E-04	6.859E-05	4.287E-03	1.029E-01	1.943E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.858E-05	6.287E-05	8.002E-05	2.172E-05	1.200E-04

Methodology is the same as page 11.

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: Emissions Calculations
Insignificant Activities**

Source Name: Karl Schmidt Unisia, Inc.

Source Location: 2425 Coliseum Blvd. South, Fort Wayne, Indiana 46803

Permit Number: T003-26469-00064

Permit Reviewer: Joe Sachse

Date: 15-Oct-09

Particulate Emissions (PM/PM₁₀) (tons/year)					
Emission Unit	Grain Loading (gr/dscf)	Air Flow Rate (scfm)	Controlled PM Emissions (tons/yr)	Uncontrolled PM Emissions (tons/yr)	Uncontrolled PM ₁₀ Emissions (tons/yr)
Grinding and machining operation	0.03	4000	4.51	29.78	2.98
		Total Emissions	4.51	29.78	2.98

Methodology

Controlled Emissions (tons/yr)= Grain Loading(gr/dscf) *Air Flow rate(scfm) *(60min/hr)* (lb/7000)*4.38 (tons hr/lb)

Uncontrolled Emissions (tons/yr) = emission factor (lb/ton) * max. cap. (lb/hr) * (ton/2000lb) * 4.38 (tons hr/lb)

Emission Factor for PM = 17 lb/ton and for PM₁₀ = 1.7 lb/ton

Emission Factor based on FIRE 6.23 SCC# 3-04-003-40



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Tony Martin
Karly Schmidt Unisia, Inc
2425 Coliseum Blvd South
Fort Wayne, IN 46803

DATE: December 23, 2009

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

SUBJECT: Final Decision
Part 70 Operating Permit Renewal
003-26469-00064

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Mark Lennart - Vice President
Charles Staehler - August Mack Environmental
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Toll Free (800) 451-6027
www.idem.IN.gov

December 23, 2009

TO: Allen County Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Karl Schmidt Unisia, Inc.
Permit Number: 003-26469-00064

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 12/23/2009 Karl Schmidt Unisia, Inc 003-26469-00064 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		Tony Martin Karl Schmidt Unisia, Inc 2425 Coliseum Blvd South Ft Wayne IN 46803 (Source CAATS) via confirmed delivery										
2		Mark Lennart Vice President of Operations Karl Schmidt Unisia, Inc 2425 Coliseum Blvd S Ft Wayne IN 46803 (RO CAATS)										
3		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
4		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
5		Mr. Victor Locke WPTA-TV P.O.Box 2121 Fort Wayne IN 46801 (Affected Party)										
6		Fort Wayne City Council and Mayors Office One Main Street Fort Wayne IN 46802 (Local Official)										
7		Mr. John E. Hampton Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
8		Mr. Charles Staehler August Mack Environmental, Inc. 1200 N. Meridian Street Ste #400 Indianapolis IN 46204 (Consultant)										
9		Allen Co. Board of Commissioners One Main St. Fort Wayne IN 46802 (Local Official)										
10		Fort Wayne-Allen County Health Department 1 E Main Street, 5th Floor Fort Wayne IN 46802-1810 (Health Department)										
11		Allen County Public Library 900 Webster Street Fort Wayne IN 46801 (Library)										
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