



# 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  
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Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a  
Federally Enforceable State Operating Permit (FESOP)  
for  
Toyota Tsusho America, Inc. in Bartholomew County

**Permit No. F005-27918-00094**

The Indiana Department of Environmental Management (IDEM), has received an application on May 12, 2009, from Toyota Tsusho America, Inc. located at 5560 South 175 West, Columbus, IN, 47201 for a renewal of their FESOP, permit number F005-20322-00094, issued on February 11, 2005. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Toyota Tsusho America, Inc. to continue to operate their existing stationary cast iron chip drying source.

This draft FESOP does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

A copy of the permit application and IDEM's preliminary findings are available at:

**Bartholomew County Public Library  
536 Fifth Street  
Columbus, IN 47201-6225**

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number **F005-27918-00094** in all correspondence.

**Comments should be sent to:**

Jeff Scull  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-6544  
Or dial directly: (317) 234-6544  
E-mail: [jscull@idem.IN.gov](mailto:jscull@idem.IN.gov)

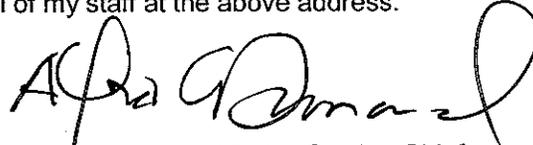
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: [www.idem.in.gov](http://www.idem.in.gov).

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions please contact Jeff Scull of my staff at the above address.



Alfred C. Dumauval, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

jws



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

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DRAFT

**Federally Enforceable State Operating Permit  
Renewal  
OFFICE OF AIR QUALITY**

**Toyota Tsusho America, Inc.  
5560 South 175 West  
Columbus, Indiana 47201**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F005-27918-00094	
Issued by:	Issuance Date:
Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary cast iron chip drying source.

Source Address:	5560 South 175 West, Columbus, Indiana 47201
Mailing Address:	5560 South 175 West, Columbus, IN, 47201
General Source Phone Number:	812-342-5600
SIC Code:	4225, 5093
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) cast iron chip handling system, identified as EU-01, including front-end bucket loader, storage bunkers, chip hoppers, conveyors, two (2) bucket elevators, chip feed bin, storage bin, two (2) dried chip storage bins and a dry chip loadout, constructed in 2005, with a maximum capacity of 18.5 tons of cast iron chips per hour, constructed in 2005, exhausting to indoors, and a dust collector constructed in 2006.
- (b) One (1) natural gas-fired cast iron chip dryer rated at 7.5 million British thermal units per hour, identified as EU-02, with a maximum capacity of 18.5 tons of cast iron chips per hour, using a cyclone, a natural gas-fired afterburner rated at 12.0 million British thermal units per hour, a heat recovery system and a baghouse as control, constructed in 2005, exhausting through Stack S1.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following 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, consisting of:  
  
Five (5) natural gas-fired space heaters, identified as IA-1, rated at 0.400 million British thermal units per hour, each.
- (b) Paved and unpaved roads and parking lots with public access identified as IA-2. [326 IAC 6-4]
- (c) One (1) 250 gallon above ground #2 diesel fuel storage tank, constructed in 2005, used to dispense fuel to mobile equipment that is used onsite.

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

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

**SECTION B GENERAL CONDITIONS**

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

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

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- (a) This permit, F005-27918-00094, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

**B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

**B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]**

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

**B.5 Severability [326 IAC 2-8-4(4)]**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

**B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance 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 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only referenced by the date of the original report.

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

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- (a) All terms and conditions of permits established prior to F005-27918-00094 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
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 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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

**B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]**

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- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Overall Source Limit [326 IAC 2-8]**

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.3 Opacity [326 IAC 5-1]**

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

### Testing Requirements [326 IAC 2-8-4(3)]

#### C.8 Performance Testing [326 IAC 3-6]

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.9 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

### C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

---

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

---

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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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.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and

- (3) corrective actions taken.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

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

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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: Chip Handling & Drying

- (a) One (1) cast iron chip handling system, identified as EU-01, including front-end bucket loader, storage bunkers, chip hoppers, conveyors, two (2) bucket elevators, chip feed bin, storage bin, two (2) dried chip storage bins and a dry chip loadout, constructed in 2005, with a maximum capacity of 18.5 tons of cast iron chips per hour, constructed in 2005, exhausting to indoors, and a dust collector constructed in 2006.
- (b) One (1) natural gas-fired cast iron chip dryer rated at 7.5 million British thermal units per hour, identified as EU-02, with a maximum capacity of 18.5 tons of cast iron chips per hour, using a cyclone, a natural gas-fired afterburner rated at 12.0 million British thermal units per hour, a heat recovery system and a baghouse as control, constructed in 2005, exhausting through Stack S1.

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

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

#### D.1.1 PM10 Limitation [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the PM10 emissions from the natural gas-fired cast iron chip dryer, identified as EU-02, shall not exceed 6.44 pounds per hour.

Compliance with this limit, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.1.2 PM2.5 Limitation [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the PM2.5 emissions from the natural gas-fired cast iron chip dryer, identified as EU-02, shall not exceed 6.44 pounds per hour.

Compliance with this limit, combined with the potential to emit PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM2.5 to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.1.3 PM Limitation [326 IAC 2-2]

The PM emissions from the natural gas-fired cast iron chip dryer, identified as EU-02, shall not exceed 29.0 pounds per hour.

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the cast iron chip handling system, identified as EU-01, and natural gas-fired cast iron chip dryer, identified as EU-02, shall each not exceed 29.0 pounds per hour when operating at a process weight rate of 18.5 tons per hour each.

The pounds per hour limitation was calculated with 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.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

### Compliance Determination Requirements

#### D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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- (a) In order to demonstrate compliance with Conditions D.1.3 and D.1.4, the Permittee shall perform PM testing on the natural gas-fired cast iron chip dryer, identified as EU-02, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from October 6, 2005, the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) In order to demonstrate compliance with Conditions D.1.1, and D.1.2 the Permittee shall perform PM<sub>2.5</sub> and PM<sub>10</sub> testing on the natural gas-fired cast iron chip dryer, identified as EU-02, within 180 days of publication of the new or revised condensable PM test method(s) referenced in the U. S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM<sub>2.5</sub>), signed on May 8th, 2008. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM<sub>10</sub> and PM<sub>2.5</sub> includes filterable and condensable PM.

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

#### D.1.7 Particulate Control

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- (a) In order to comply with Conditions D.1.1, D.1.2, D.1.3 and D.1.4, the baghouse and cyclone for particulate control shall be in operation and control emissions from the natural gas-fired cast iron chip dryer, identified as EU-02, at all times that the dryer is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.1.8 Visible Emissions Notations

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- (a) Visible emission notations of the natural gas-fired cast iron chip dryer stack exhaust S1 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.1.9 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse used in conjunction with the natural gas-fired cast iron chip dryer (EU-02), at least once per day when the natural gas-fired cast iron chip dryer is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

#### D.1.10 Cyclone Inspections

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An inspection shall be performed each calendar quarter of all cyclones controlling the natural gas-fired cast iron chip dryer.

#### D.1.11 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the natural gas-fired cast iron chip dryer (EU-02). Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

#### D.1.12 Cyclone Failure Detection

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the natural gas-fired cast iron chip dryer (EU-02). Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### D.1.13 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.8, the Permittee shall maintain daily records of the visible emission notations of the natural gas-fired cast iron chip dryer stack exhaust S1. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain daily records of the pressure drop across the baghouse controlling the natural gas-fired cast iron chip dryer (EU-02). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9.
- (d) 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**

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

Source Name: Toyota Tsusho America, Inc.  
Source Address: 5560 South 175 West, Columbus, Indiana 47201  
Mailing Address: 5560 South 175 West, Columbus, IN, 47201  
FESOP Permit No.: F005-27918-00094

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)\_\_\_\_\_
- Report (specify)\_\_\_\_\_
- Notification (specify)\_\_\_\_\_
- Affidavit (specify)\_\_\_\_\_
- Other (specify)\_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Toyota Tsusho America, Inc.  
Source Address: 5560 South 175 West, Columbus, Indiana 47201  
Mailing Address: 5560 South 175 West, Columbus, IN, 47201  
FESOP Permit No.: F005-27918-00094

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) 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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Toyota Tsusho America, Inc.  
Source Address: 5560 South 175 West, Columbus, Indiana 47201  
Mailing Address: 5560 South 175 West, Columbus, IN, 47201  
FESOP Permit No.: F005-27918-00094

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD)  
for a  
Federally Enforceable State Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Toyota Tsusho America, Inc.</b>
<b>Source Location:</b>	<b>5560 South 175 West, Columbus, IN, 47201</b>
<b>County:</b>	<b>Bartholomew</b>
<b>SIC Code:</b>	<b>4225, 5093</b>
<b>Permit Renewal No.:</b>	<b>F005-27918-00094</b>
<b>Permit Reviewer:</b>	<b>Jeff Scull</b>

On May 12, 2009, the Office of Air Quality (OAQ) received an application from Toyota Tsusho America, Inc. (TAI) requesting to renew its FESOP, Permit No. F005-20322-00094, issued on February 11, 2005, for the operation of a stationary cast iron chip drying source.

**History**

On May 12, 2009, Toyota Tsusho America, Inc. submitted an application to the OAQ requesting to renew its operating permit. Toyota Tsusho America, Inc. was issued a FESOP, Permit No. F005-20322-00094, on February 11, 2005. On March 7, 2006, Review Request No. 005-22969-00094 was issued allowing the source to lower the operating temperature of the afterburner associated with the chip dryer from 1,400°F to 800°F. On November 17, 2006, Administrative Amendment No. 005-23690-00094 was issued allowing the source the addition of a dust collector for the chip handling system.

**Source Definition**

**Pursuant to FESOP, Permit No. F005-20322-00094, issued on February 11, 2005:**

Although Toyota Tsusho America, Inc. (TAI) is located contiguous with Toyota Industrial Equipment Manufacturing, Inc. (TIEM), these two (2) sources are not owned by the same company. TAI is owned by Toyota Tsusho Corporation, a publicly traded company in Japan and TIEM is owned by Toyota Industrial Equipment Manufacturing Corporation which is a totally separate publicly traded company in Japan. Furthermore TAI and TIEM are not managed by the same company nor do they share managers or officers for their respective daily operations.

In addition TAI is not a support facility to Toyota Industrial Equipment Manufacturing, Inc. None of the products produced at TAI will be sent to Toyota Industrial Equipment Manufacturing, Inc. The chips to be dried at TAI will be sent to processing facilities that are not owned by Toyota. Toyota Industrial Equipment Manufacturing, Inc. is operating under a separate Part 70 Operating Permit T 005-7545-00040, issued on April 14, 1999.

The air pollutant emitting operations at TAI and Toyota Industrial Equipment Manufacturing, Inc. are completely different operations. The standard industrial classification (SIC) for Toyota Industrial Equipment Manufacturing, Inc. is 3537 while the SIC for TAI is 5093. Toyota Industrial Equipment Manufacturing, Inc. manufactures industrial equipment, such as fork lifts, and does not utilize dried cast iron chips.

Toyota Industrial Equipment Manufacturing, Inc. currently uses the existing warehouse on the site of TAI, but there are no air pollutant emissions from the warehouse operations. The proposed chip drying facilities at TAI are a totally different operation than the warehouse operations.

IDEM, OAQ has determined that the Toyota Tsusho America, Inc. (TAI) and Toyota Industrial Equipment Manufacturing, Inc. are separate sources and therefore, TAI will be issued a FESOP.

### **Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) cast iron chip handling system, identified as EU-01, including front-end bucket loader, storage bunkers, chip hoppers, conveyors, two (2) bucket elevators, chip feed bin, storage bin, two (2) dried chip storage bins and a dry chip loadout, constructed in 2005, with a maximum capacity of 18.5 tons of cast iron chips per hour, constructed in 2005, exhausting to indoors, and a dust collector constructed in 2006.
- (b) One (1) natural gas-fired cast iron chip dryer rated at 7.5 million British thermal units per hour, identified as EU-02, with a maximum capacity of 18.5 tons of cast iron chips per hour, using a cyclone, a natural gas-fired afterburner rated at 12.0 million British thermal units per hour, a heat recovery system and a baghouse as control, constructed in 2005, exhausting through Stack S1.

### **Emission Units and Pollution Control Equipment Removed From the Source**

The original FESOP and all subsequent permits issued to the source had listed in the A.3 Insignificant Activities section of the permit under other emergency equipment as follows: stationary fire pumps. Although the original application submitted on October 28, 2004 had stationary fire pumps listed as one of the insignificant activities in operation at the source, the source indicates there were never any stationary fire pumps at the source. Therefore; all references to stationary fire pumps have been removed from this permit.

### **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, consisting of:
  - Five (5) natural gas-fired space heaters, identified as IA-1, rated at 0.400 million British thermal units per hour, each.
- (b) Paved and unpaved roads and parking lots with public access identified as IA-2. [326 IAC 6-4]
- (c) One (1) 250 gallon above ground #2 diesel fuel storage tank, constructed in 2005, used to dispense fuel to mobile equipment that is used onsite.

### **Existing Approvals**

Since the issuance of the FESOP (F005-20322-00094) on February 11, 2005, the source has constructed or has been operating under the following approvals as well:

- (a) Review Request No. (005-22969-00094) issued on March 7, 2006; and
- (b) Administrative Amendment No. (005-23690-00094) issued on November 17, 2006.

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.

The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

(a) Insignificant Activities

The source constructed in 2005 one (1) 250 gallon above ground #2 diesel fuel storage tank used to dispense fuel to mobile equipment that is used onsite. This was never included in the previous permits. The source has requested that the fuel tank be included in this FESOP Renewal.

**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 Bartholomew County

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(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) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Bartholomew County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**  
 Bartholomew County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 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 PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**  
 Bartholomew County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

<b>Pollutant</b>	<b>tons/year</b>
PM	332.36
PM <sub>10</sub>	311.85
PM <sub>2.5</sub>	311.85
SO <sub>2</sub>	0.06
VOC	21.74
CO	7.91
NO <sub>x</sub>	9.42

<b>HAPs</b>	<b>Potential to Emit (tons/yr)</b>
Benzene	0.0002
Dichlorobenzene	0.0001
Formaldehyde	0.007
Hexane	0.170
Toluene	0.0003
Lead Compounds	0.186
Cadmium Compounds	0.003
Chromium Compounds	0.019
Manganese Compounds	0.00004
Nickel Compounds	0.033
Colbalt Compounds	0.002
Arsenic Compounds	0.006
Selenium Compounds	0.0008
<b>Total HAPs</b>	<b>0.428</b>

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (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.
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

**Potential to Emit After Issuance**

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)							
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Chip Handling	48.62	29.17	29.17	0.00	0.00	0.00	0.00	0.25
Chip Dryer (Process)	<127.0	<28.20	<28.20	0.00	21.22	0.00	0.00	negl.
Chip Dryer (Combustion)	0.06	0.25	0.25	0.02	0.18	2.76	3.29	0.06
Afterburner (Combustion)	0.10	0.40	0.40	0.03	0.29	4.42	5.26	0.10
Space Heaters	0.02	0.07	0.07	0.01	0.05	0.74	0.88	0.02
Paved Roads (Mitigated PTE*)	1.98	0.39	0.39	negl.	negl.	negl.	negl.	negl.
<b>Total Emissions</b>	<b>&lt;177.78</b>	<b>&lt;58.47</b>	<b>&lt;58.47</b>	<b>0.06</b>	<b>21.74</b>	<b>7.91</b>	<b>9.42</b>	<b>0.43**</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10 Single 25 Total
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA
negl. = negligible *Taking natural mitigation due to precipitation into consideration. **Largest Single HAP is Lead at 0.186 tons/year.  Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".								

(a) FESOP Status

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

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

- (1) The PM10 emissions from the natural gas-fired cast iron chip dryer, identified as EU-02, shall not exceed 6.44 pounds per hour.

Compliance with this limit, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

(b) PSD Minor Source

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

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) The PM emissions from the natural gas-fired cast iron chip dryer, identified as EU-02, shall not exceed 29.0 pounds per hour.

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) Fugitive Emissions

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

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit renewal.
- (b) 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.

Compliance Assurance Monitoring (CAM)

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

**State Rule Applicability - Entire Source**

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit at this source is less than twenty-five (25) tons per year.
- (h) There are no other 326 IAC 8 Rules that are applicable to the source.
- (i) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.

- (j) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

### State Rule Applicability – Individual Facilities

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

- (a) The particulate from the cast iron chip handling system, EU-01, shall not exceed 29.0 pounds per hour each when operating at a process weight rate of 18.5 tons per hour. The uncontrolled potential PM emissions from this operation, as shown on page 1 of 4 of Appendix A, are 48.6 tons per year, equivalent to 11.1 pounds per hour. Therefore, the chip handling system is able to comply with this rule without the use of a control device.
- (b) The particulate from the cast iron chip dryer, EU-02, shall not exceed 29.0 pounds per hour each when operating at a process weight rate of 18.5 tons per hour. The potential PM emissions from this operation, after control, as shown on page 1 of 4 of Appendix A, are 5.63 tons per year, equivalent to 1.29 pounds per hour. Therefore, the chip dryer is able to comply with this rule with the use of a control device.

The cyclone/baghouse shall be in operation at all times that the cast iron chip dryer, EU-02, is in operation, in order to comply with the 326 IAC 6-3-2 allowable emission rate.

These limitations are based upon the following:

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

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

- (c) Pursuant to 326 IAC 6-3-1(a), activities that do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2), are exempted from 326 IAC 6-3. The five (5) natural gas-fired space heaters, each, do not meet the definition of a "manufacturing process", and are therefore not subject to the requirements of 326 IAC 6-3, and the requirements are not included in the permit.

#### 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)

Pursuant to 326 IAC 7-1.1, this rule applies to all emissions units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. The potential emissions from the five (5) natural gas-fired space heaters, each, are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, the five (5) natural gas-fired space heaters are not subject to requirements of 326 IAC 7-1.1-2, and the requirements are not included in the permit.

#### 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Pursuant to 326 IAC 8-4-3(a), this rule applies to all petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (thirty-nine thousand (39,000) gallons) containing volatile organic compounds whose true vapor pressure is greater than 10.5 kPa (1.52 psi). The one (1) 250 gallon above ground #2 diesel fuel storage tank has a capacity less than thirty-nine thousand (39,000) gallons. Therefore, the one (1) 250 gallon above ground #2 diesel fuel storage tank is not subject to requirements of 326 IAC 8-4-3, and the requirements are not included in the permit.

### Compliance Determination and Monitoring Requirements

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

Emission Unit/Control	Operating Parameters	Frequency
EU-02 Baghouse	Pressure Drop of 1" - 6" Range	Once per day
EU-02 exhaust S1	Visible Emissions Notations	Once per day

- (b) The testing requirements applicable to this source are as follows:

- (1) The Permittee shall perform PM testing on the natural gas-fired cast iron chip dryer, identified as EU-02, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from October 6, 2005, the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (2) The Permittee shall perform PM<sub>2.5</sub> and PM<sub>10</sub> testing on the natural gas-fired cast iron chip dryer, identified as EU-02, within 180 days of publication of the new or revised condensable PM test method(s) referenced in the U. S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM<sub>2.5</sub>), signed on May 8th, 2008. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM<sub>10</sub> and PM<sub>2.5</sub> includes filterable and condensable PM.

There are no compliance monitoring conditions applicable to the afterburner because it is not necessary to operate the afterburner to comply with any applicable rules. The potential to emit VOC from the chip dryer before controls is less than twenty five (25) tons per year.

These monitoring conditions are necessary because the baghouse for the cast iron chip dryer (EU-02) must operate properly to ensure compliance with 326 IAC 6-3 and 326 IAC 2-8-4 as well as to make the requirements of 326 IAC 2-2 not applicable.

### Recommendation

The staff recommends to the Commissioner that the FESOP 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 May 12, 2009. Additional information was received on May 18, 2009 and June 5, 2009.

### Conclusion

The operation of this stationary cast iron chip drying source shall be subject to the conditions of the attached FESOP Renewal No. F005-27918-00094.

**Appendix A: Emissions Calculations  
Summary**

**Company Name: Toyota Tsucho America, Inc.  
Address City IN Zip: 5560 South 175 West, Columbus, Indiana 47201  
Permit Number: F005-27918-00094  
Plt ID: 005-00094  
Reviewer: Jeff Scull  
Date: June 4, 2009**

**Summary of Potential Emissions Before Controls (tons/year)**

Emission Unit	Pollutant						
	PM	PM10 / PM2.5	SO2	NOx	VOC	CO	HAPs
Chip Handling	48.62	29.17	0.00	0.00	0.00	0.00	0.25
Chip Dryer (Process)	281.58	281.58	0.00	0.00	21.22	0.00	0.00
Chip Dryer (Combustion)	0.06	0.25	0.02	3.29	0.18	2.76	0.06
Afterburner (Combustion)	0.10	0.40	0.03	5.26	0.29	4.42	0.10
<b>Insignificant Activities</b>							
Space Heaters	0.02	0.07	0.01	0.88	0.05	0.74	0.02
Paved Roads	1.98	0.39	0.00	0.00	0.00	0.00	0.00
<b>Totals</b>	<b>332.36</b>	<b>311.85</b>	<b>0.06</b>	<b>9.42</b>	<b>21.74</b>	<b>7.91</b>	<b>0.43</b>

**Summary of Limited Potential Emissions Before Controls (tons/year)**

Emission Unit	Pollutant						
	PM	PM10 / PM2.5	SO2	NOx	VOC	CO	HAPs
Chip Handling	48.62	29.17	0.00	0.00	0.00	0.00	0.25
Chip Dryer (Process)	127.00	28.20	0.00	0.00	21.22	0.00	0.00
Chip Dryer (Combustion)	0.06	0.25	0.02	3.29	0.18	2.76	0.06
Afterburner (Combustion)	0.10	0.40	0.03	5.26	0.29	4.42	0.10
<b>Insignificant Activities</b>							
Space Heaters	0.02	0.07	0.01	0.88	0.05	0.74	0.02
Paved Roads	1.98	0.39	0.00	0.00	0.00	0.00	0.00
<b>Totals</b>	<b>177.78</b>	<b>58.07</b>	<b>0.06</b>	<b>9.42</b>	<b>21.74</b>	<b>7.91</b>	<b>0.43</b>

**Summary of Potential Emissions After Controls (tons/year)**

Emission Unit	Pollutant						
	PM	PM10 / PM2.5	SO2	NOx	VOC	CO	HAPs
Chip Handling	48.62	29.17	0.00	0.00	0.00	0.00	0.25
Chip Dryer (Process)	5.63	5.63	0.00	0.00	0.21	0.00	0.00
Chip Dryer (Combustion)	0.06	0.25	0.02	3.29	0.18	2.76	0.06
Afterburner (Combustion)	0.10	0.40	0.03	5.26	0.29	4.42	0.10
<b>Insignificant Activities</b>							
Space Heaters	0.02	0.07	0.01	0.88	0.05	0.74	0.02
Paved Roads (Mitigated PTE*)	1.81	0.35	0.00	0.00	0.00	0.00	0.00
<b>Totals</b>	<b>56.24</b>	<b>35.87</b>	<b>0.06</b>	<b>9.42</b>	<b>0.73</b>	<b>7.91</b>	<b>0.43</b>

\*Taking natural mitigation due to precipitation into consideration.

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

**Company Name:** Toyota Tsucho America, Inc.  
**Address City IN Zip:** 5560 South 175 West, Columbus, Indiana 47201  
**Permit Number:** F005-27918-00094  
**Plt ID:** 005-00094  
**Reviewer:** Jeff Scull  
**Date:** June 4, 2009

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Facility Description
7.50	66	Chip Dryer
12.00	105	Afterburner
2.00	18	5 Space Heaters

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10 / PM2.5*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr						
Chip Dryer	0.062	0.250	0.020	3.29	0.181	2.76
Afterburner	0.100	0.399	0.032	5.26	0.289	4.42
5 Space Heaters	0.017	0.067	0.005	0.876	0.048	0.736
<b>Total</b>	<b>0.179</b>	<b>0.716</b>	<b>0.057</b>	<b>9.42</b>	<b>0.518</b>	<b>7.91</b>

\*PM emission factor is filterable PM only. PM10 / PM2.5 emission factor is filterable and condensable PM10 / PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4 Natural Gas Combustion, Tables 1.4-1 (for Nox and CO), 1.4-2 (for PM, PM10, SO2, and VOC), 1.4-3 (for HAPS)

SCC #1-02-006-02(for Natural Gas Combustion 10-100 mmBtu/hr), 1-01-006-02 (for Boilers < 100 mmBtu/hr except Tangential),

1-03-006-02 (for Natural Gas Combustion 10-100 mmBtu/hr), and 1-03-006-03 (for Natural Gas Combustion <10 mmBtu/hr)

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

See next page for HAPs emissions calculations.

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

**Company Name: Toyota Tsucho America, Inc.  
Address City IN Zip: 5560 South 175 West, Columbus, Indiana 47201  
Permit Number: F005-27918-00094  
Plt ID: 005-00094  
Reviewer: Jeff Scull  
Date: June 4, 2009**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03
Potential Emission in tons/yr					
Chip Dryer	6.90E-05	3.94E-05	2.46E-03	5.91E-02	1.12E-04
Afterburner	1.10E-04	6.31E-05	3.94E-03	9.46E-02	1.79E-04
5 Space Heaters	1.84E-05	1.05E-05	6.57E-04	1.58E-02	2.98E-05
Total	1.98E-04	1.13E-04	7.06E-03	1.70E-01	3.20E-04

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03	Total
Potential Emission in tons/yr						
Chip Dryer	1.64E-05	3.61E-05	4.60E-05	1.25E-05	6.90E-05	<b>6.20E-02</b>
Afterburner	2.63E-05	5.78E-05	7.36E-05	2.00E-05	1.10E-04	<b>9.92E-02</b>
5 Space Heaters	4.38E-06	9.64E-06	1.23E-05	3.33E-06	1.84E-05	<b>1.65E-02</b>
Total	4.71E-05	1.04E-04	1.32E-04	3.58E-05	1.98E-04	<b>1.78E-01</b>

Methodology is the same as previous page.

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

Appendix A: Emission Calculations

Company Name: Toyota Tsucho America, Inc.  
 Address City IN Zip: 5560 South 175 West, Columbus, Indiana 47201  
 Permit Number: F005-27918-00094  
 Plt ID: 005-00094  
 Reviewer: Jeff Scull  
 Date: June 4, 2009

\*\* Process Emissions \*\*

Process:	Rate (tons/hr)	Pollutant	Emission Factor (lb/ton handled)	Emissions Before Control (ton/yr)	Type of control	Control Efficiency (%)	Emissions After Control (ton/yr)
EU-01 Cast Iron Chip Handling System  SCC# 3-04-003-15 FIRE 6.23	18.5	PM	0.60	48.62	None	0.00%	48.62
		PM-10 / PM2.5	0.36	29.17	None	0.00%	29.17
		SO2	0.00	0.00	None	0.00%	0.00
		NOx	0.00	0.00	None	0.00%	0.00
		VOC	0.00	0.00	None	0.00%	0.00
		CO	0.00	0.00	None	0.00%	0.00
		chromium	0.00023	1.86E-02	None	0.00%	1.86E-02
		cobalt	0.00002	1.62E-03	None	0.00%	1.62E-03
		nickel	0.00040	3.24E-02	None	0.00%	3.24E-02
		arsenic	0.00008	6.48E-03	None	0.00%	6.48E-03
		cadmium	0.00004	3.24E-03	None	0.00%	3.24E-03
		selenium	0.00001	8.10E-04	None	0.00%	8.10E-04
		Lead	0.00230	1.86E-01	None	0.00%	1.86E-01
<b>Total HAPs</b>			<b>0.250</b>			<b>0.250</b>	

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

$$\begin{aligned}
 &P = 18.5 \text{ tons/hr} \\
 \text{limit} &= 4.1 \times (18.5^{0.67}) = 29.0 \text{ lb/hr (allowable)} \\
 \text{with potential:} & \\
 &48.6 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 11.1 \text{ lb/hr (able to comply)}
 \end{aligned}$$

Process:	Rate (tons/hr)	Pollutant	Emission Factor (lb/ton handled)	Emissions Before Control (ton/yr)	Type of control	Control Efficiency (%)	Emissions After Control (ton/yr)
EU-02 Cast Iron Chip Dryer Process Only	18.5	PM	3.48	282	Cyclone & Baghouse	98.00%	5.63
		PM-10 / PM2.5	3.48	282	Baghouse	98.00%	5.63
		SO2	0.00	0.00	None	0.00%	0.00
		NOx	0.00	0.00	None	0.00%	0.00
		VOC	0.26189	21.2	Afterburner	99.00%	0.212
		CO	0.00	0.00	None	0.00%	0.00

**Metal Chip Dryer**

PM & PM-10 emission factors are derived from 0.5 grains per cubic foot per minute from manufacturer as used in original FESOP F 005-20322-00094 issued on February 11, 2005.

VOC emission factor is calculated from the average of 12 different cast iron chips generated from different process facilities.

VOC emissions = Average moisture content on the chips multiplied by the average machining fluid content of the mixture (water & machining fluid) multiplied by the average VOC content of the machining fluids.

The VOC content of the machining fluid was determined from MSDSs as well as from a laboratory analysis using ASTM Method D6304 for water content & EPA 600 160.3 for solids.

The MSDS method yielded a 9.87% VOC, while the laboratory analysis showed only 6.08% VOC. The higher VOC content was used to determine the VOC emission factor.

$$\text{VOC emission factor} = 2.166\% \text{ moisture} \times 6.125\% \text{ machining fluid content} \times 9.87\% \text{ VOC in machining fluid} \times 2,000 \text{ lbs/ton} = 0.26189 \text{ lbs of VOC/ton}$$

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name:** Toyota Tsucho America, Inc.  
**Address City IN Zip:** 5560 South 175 West, Columbus, Indiana 47201  
**Permit Number:** F005-27918-00094  
**Plt ID:** 005-00094  
**Reviewer:** Jeff Scull  
**Date:** June 4, 2009

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	44.4	1.0	44.4	25.0	1110.0	1000	0.189	8.4	3069.3
Vehicle (leaving plant) (one-way trip)	44.4	1.0	44.4	15.0	666.0	1000	0.189	8.4	3069.3
<b>Total</b>			<b>88.8</b>		<b>1776.0</b>			<b>16.8</b>	<b>6138.6</b>

Average Vehicle Weight Per Trip =  tons/trip  
 Average Miles Per Trip =  miles/trip

Unmitigated Emission Factor, Ef = [k \* (sL/2)<sup>0.65</sup> \* (W/3)<sup>1.5</sup> - C] (Equation 1 from AP-42 13.2.1)

	PM	PM10/PM2.5	
where k =	0.082	0.016	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	20.0	20.0	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer mon)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E \* [1 - (p/4N)]

Mitigated Emission Factor, Eext = Ef \* [1 - (p/4N)]

where p =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N =  days per year

	PM	PM10/PM2.5	
Unmitigated Emission Factor, Ef =	0.64	0.13	lb/mile
Mitigated Emission Factor, Eext =	0.59	0.11	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10/PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10/PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10/PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.99	0.19	0.90	0.18	0.45	0.09
Vehicle (leaving plant) (one-way trip)	0.99	0.19	0.90	0.18	0.45	0.09
<b>Total</b>	<b>1.98</b>	<b>0.39</b>	<b>1.81</b>	<b>0.35</b>	<b>0.90</b>	<b>0.18</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
 PM2.5 = Particulate Matter (<2.5 um)  
 PM10 = Particulate Matter (<10 um)  
 PTE = Potential to Emit



# 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](http://www.idem.IN.gov)

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

October 13, 2009

The Republic  
Jan Rittenhouse  
333 Second Street  
P.O. Box 3001  
Columbus, IN 47201

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Toyota Tsusho America, Inc., Bartholomew County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than Monday, October 19, 2009.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

*Greg Hotopp*  
Greg Hotopp  
Permit Branch  
Office of Air Quality

Permit Level: Federally Enforceable State Operating Permit Renewal  
Permit Number: 005-27918-00094

Enclosure  
PN Newspaper.dot 6/18/09



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October 13, 2009

To: Bartholomew County Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: Toyota Tsusho America, Inc.**  
**Permit Number: 005-27918-00094**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library.dot 03/27/08



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October 13, 2009

Mr. Joe Lawson  
Toyota Tsusho America, Inc.  
5560 S 175 W  
Columbus, IN 47201

Re: Public Notice  
Toyota Tsusho America, Inc.  
Permit Level: FESOP Renewal  
Permit Number: 005-27918-00094

Dear Mr. Lawson:

Enclosed is a copy of your draft FESOP Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Bartholomew County Public Library, 536 Fifth Street in Columbus, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Republic in Columbus, Indiana publish this notice no later than October 19, 2009.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Jeff Scull, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6544 or dial (317) 234-6544.

Sincerely,

*Greg Hotopp*

Greg Hotopp  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter. dot 3/27/08



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## Notice of Public Comment

**October 13, 2009**

**Toyota Tsusho America, Inc.**

**005-27918-00094**

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 2-8469 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover.dot 3/27/08

# Mail Code 61-53

IDEM Staff	GHOTOPP 10/13/2009 Toyota Tsusho America, Inc 005-27918-00094 Draft		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Joe Lawson Toyota Tsusho America, Inc 5560 S 175 W Columbus IN 47201 (Source CAATS)										
2		Columbus City Council and Mayors Office 123 Washington St Columbus IN 47201 (Local Official)										
3		Mr. Elbert Held 734 Hutchins Columbus IN 47201 (Affected Party)										
4		Mr. Boris Ladwig 333 2nd St Columbus IN 47201 (Affected Party)										
5		Eileen Booher 1316 Chestnut St. Columbus IN 47201 (Affected Party)										
6		Mr. Lcnfc 1039 Sycamore St Columbus IN 47201 (Affected Party)										
7		Bartholomew Co Public Library 536 Fifth St. Columbus IN 47201-6225 (Library)										
8		Bartholomew County Commissioners 440 Third Street Columbus IN 47202 (Local Official)										
9		Mr. Jean Terpstra 3210 Grove Pkwy Columbus IN 47203 (Affected Party)										
10		August Tindell 31 Reo Street Columbus IN 47201 (Affected Party)										
11		Terry Lowe 1110 Central Ave. Columbus IN 47201 (Affected Party)										
12		Mr. Charles Mitch 3210 Grove Parkway Columbus IN 47203 (Affected Party)										
13		Mr. David Howard Cornerstone Environmental, Health & Safety, Inc. 880 Lennox Court Zionsville IN 46077 (Consultant)										
14		Edinburgh Town Council and Town Manager P.O. Box 65 Edinburgh IN 46124 (Local Official)										
15		Bartholomew County Health Department 440 3rd Street, Suite 303 Columbus IN 47201 (Health Department)										

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<b>15</b>			