



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 9, 2010

RE: Indiana Automotive Fasteners, Inc. / 059-28795-00024

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 12/3/07



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Gary Berling
Indiana Automotive Fasteners, Inc.
1300 West Anderson Boulevard
Greenfield, Indiana 46140

Mar. 9, 2010

Re: 059-28795-00024
First Minor Revision to
F059-21946-00024

Dear Gary Berling:

Indiana Automotive Fasteners, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) No. F059-21946-00024 on December 17, 2007 for a stationary facility manufacturing nuts and bolts for the automotive industry located at 1300 West Anderson Boulevard, Greenfield, Indiana 46140. On November 20, 2009, the Office of Air Quality (OAQ) received an application from the source requesting to add a thermal oxidizer as a control device for two of its dip coating lines, and to change its VOC limit from a pound per day limit to a pound VOC per gallon of coating limit. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Minor Permit Revision (MPR) procedures of 326 IAC 2-8-11.1(d). Pursuant to the provisions of 326 IAC 2-8-11.1, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached

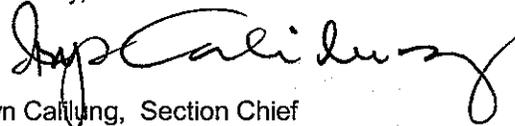
Indiana Automotive Fasteners, Inc.
Greenfield, Indiana
Permit Reviewer: Jack Harmon

Page 2 of 2
FESOP MPR No. 059-28795-00024

please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jack Harmon, of my staff, at 317-233-4228 or 1-800-451-6027, and ask for extension 3-4228.

Sincerely,



Iryn Callung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/jh

cc: File - Hancock County
Hancock County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Indiana Automotive Fasteners, Inc.
1300 West Anderson Boulevard
Greenfield, Indiana 46140**

(herein known as the Permittee) is hereby authorized to construct and 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.: F059-21946-00024 | |
| Issued by/Original Signed By: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality | Issuance Date: December 17, 2007 Expiration Date: December 17, 2012 |

First Significant Permit Revision No.: F059-27527-00024, Issued June 18, 2009.
First Administrative Amendment No.: F059-28502-00024, Issued November 5, 2009.

| | |
|--|--|
| First Minor Permit Revision No.: 059-28795-00024 | |
| Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality | Issuance Date: Mar. 9, 2010 Expiration Date: December 17, 2012 |

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Attachment A: NESHAP Subpart 6W - Area Source Standards for Plating and Polishing Operations
[40 CFR 63, Subpart 6W] [326 IAC 20]

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary facility manufacturing nuts and bolts for the automotive industry.

| | |
|------------------------------|--|
| Source Address: | 1300 West Anderson Boulevard, Greenfield, IN 46140 |
| Mailing Address: | 1300 West Anderson Boulevard, Greenfield, IN 46140 |
| General Source Phone Number: | 317-467-0100 |
| SIC Code: | 3452 |
| County Location: | Hancock |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

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

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

- (a) Fifty-seven (57) head forming machines and two (2) nut forming machines, collectively identified as EU-6, constructed between 1996 and 2007, each processing a maximum of 12,000 fasteners per hour, each controlled by a Smog Hog Electrostatic Precipitator, thirty-five (35) of the head forming machines exhausting to stacks V6:1-11 and the remaining machines exhausting within the building;
- (b) Dacrotizing Coating Line 1, identified as DC1, constructed in 1996, modified in 2009, and approved for modification in 2010, for the application of corrosion resistant coatings to ferrous-based metal fasteners, and consisting of:
 - (1) One (1) cleaner wash and natural gas fired dry-off oven (DC1), identified as EU-7, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V7A and V7B.
 - (2) Two (2) SBL shot blasters (DC1), identified as EU-8a and EU-8b, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
 - (3) One (1) dacrotizing metal treatment process (DC1), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V9-2;
 - (4) One (1) natural gas fired dacrotizing oven, identified as EU-9a, constructed in 1996, each rated at 1.0 MMBtu/hr, uncontrolled, and exhausting to stacks V9 and V9-1;
 - (5) One (1) dacrotizing metal treatment process (DC1), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal

oxidizer with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V9-2;

- (c) Barrel Zinc Plating Line 1, identified as BZ1, constructed in 1996, for the application of zinc and chrome coatings to ferrous-based metal fasteners, and consisting of:
 - (1) One (1) electric zinc plating oven, identified as EU-10, uncontrolled, and exhausting to stack V10;
 - (2) One (1) zinc plating/ trivalent chromium treatment dip process, identified as EU-12, coating a maximum of 2,700 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V12; [326 IAC 8-2-9]

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.
- (d) Dacrotizing Coating Line 2, formerly identified as DC2 and re-identified as DS2, constructed in 2002, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
 - (1) Two (2) SBL shot blasters (DS2), identified as EU-20a, and EU-20b, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;
 - (2) One (1) cleaner wash and natural gas fired dry-off oven (DS2), identified as EU-21, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V21A and V21B.
 - (3) One (1) dip coating operation and natural gas fired dry-off oven (DS2), identified as EU-22, rated at 0.7 MMBtu/hr, processing a maximum of 660 pounds of fasteners per hour, uncontrolled, and exhausting to stacks V22-A and V22-B;
- (e) Barrel Zinc Plating Line 2, identified as BZ2, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the following:
 - (1) One (1) electric zinc plating oven, identified as EU-10, constructed in 1996, uncontrolled, and exhausting to stack V27;
 - (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-27, constructed in 2002, coating a maximum of 2,700 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V26;

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.
- (f) Dacrotizing Line 3, identified as DS3, approved for construction in 2009, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
 - (1) One (1) SBL shot blaster (DS3), identified as EU-37, with a combined maximum throughput of 343 Pounds of fasteners per hour and 560 lbs per hour of steel

- shot. EU-37 will be controlled by one (1) baghouse that is exhausted through stack V37.
- (2) One (1) dip coating operation (DS3), identified as EU-38, with a maximum throughput of 660 pounds of fasteners per hour, uncontrolled, and exhausting to the inside of the building.
 - (3) One (1) natural gas fired pre-cure oven (DS3), identified as EU-39, with one (1) burner rated at 0.14 MMBtu/hr, uncontrolled and exhausted through stack V39.
 - (4) One (1) natural gas fired cure oven (DS3) with a cooling zone, identified as EU-40, with six (6) burners rated at 0.16 MMBtu/hr, uncontrolled and exhausted through stacks V40a & V40b.
- (g) Barrel Zinc plating line 3, identified as BZ3, approved for construction in 2009, for the application of zinc and chrome coatings to ferrous based metal fasteners, and including the following:
- (1) One (1) alkaline zinc plating and trivalent chromium treatment dip process, identified as EU-41, (no VOC's) coating a maximum of 3000 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V41;
- Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

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

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

- (a) One (1) electric annealing oven (LAN), identified as EU-1, processing a maximum of 1,100 pounds of fasteners per hour, constructed in 1996, uncontrolled, and exhausting to stacks V1a and V1b;
- (b) One (1) electric bluing oven (AOQ) identified as EU-2, processing a maximum of 1,100 pounds of fasteners per hour, constructed in 1996, uncontrolled, and exhausting to stacks V2a and V2b;
- (c) Oil Quench Line 1 (OQ1), identified EU-3, constructed 1996, for the heat treatment of metal fasteners at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V24, V3, V4 & V5 and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
 - (3) One (1) electric tempering furnace.
- (d) Two (2) natural gas fired boilers, identified as EU-15, and EU-15-1, constructed in 1996, each rated at 2.1 MMBtu/hr, and exhausting to stacks V15 and V15-1; [326 IAC 6-2-4]
- (e) One (1) natural gas fired boiler, identified as EU-16, rated at 1.2 MMBtu/hr, constructed in 1996, and exhausting to stack V16; [326 IAC 6-2-4]
- (f) Two (2) 7,000 gallon hydrochloric acid (HCL) storage tanks, identified as EU-18, constructed in 2007, controlled by the BZ2 scrubber, and exhausting to stack V26;

- (g) One (1) top coating operation, identified as TC, using dip coating to apply VOC and HAP free coatings to metal fasteners, and consisting of:
 - (1) One (1) dip coating operation and natural gas fired dry-off oven, identified as EU-23, rated at 0.16 MMBtu/hr, processing a maximum of 700 pounds of fasteners per hour, uncontrolled, and exhausting to stacks V23-A and V23-B;
 - (2) One (1) natural gas fired bake oven (TC), identified as EU-14, rated at 0.4 MMBtu/hr, processing a maximum of 76,000 fasteners per hour, uncontrolled, and exhausting to stack V14;
- (h) Oil Quench Line 2 (OQ2), identified EU-25, constructed in 2002, for the heat treatment of metal fasteners, at a rate of 7,000lb/hr, uncontrolled, exhausting to stacks V24, V25A, V25B, V25C & V25D, and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
 - (3) One (1) natural gas fired tempering furnace, rated at 0.16MMBtu/hr;
- (i) Oil Quench Line 3 (OQ3), identified EU-29, for the heat treatment of metal fasteners, at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V28, V29A, V29B & V29C, and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
 - (3) One (1) natural gas fired tempering furnace, rated at 0.16MMBtu/hr;
- (j) Oil Quench Line 4 (OQ4), identified EU-31, for the heat treatment of metal fasteners at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V28, V31A, V31B & V31C, and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
 - (3) One (1) natural gas fired tempering furnace rated at 0.16MMBtu/hr;
- (k) Oil Quench Line 5 (OQ5), identified EU-33, for the heat treatment of metal fasteners, at a rate of 7000 lbs of fasteners/hr, uncontrolled, exhausting to stacks V32, V33A, V33B & V33C, and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
 - (3) One (1) natural gas fired tempering furnace, rated at 0.16MMBtu/hr;

- (l) Lubricating Oil Quench Line (LOQ), identified as EU-34, for the heat treatment of metal fasteners, at a rate of 4800 per hour, uncontrolled, exhausting to stacks V34A through V34K, and consisting of:
 - (1) one (1) pre wash/dry unit;
 - (2) two (2) gas generator,
 - (3) four (4) natural gas-fired quenching furnaces, each rated at 0.34 MMBtu/hr,
 - (4) four (4) oil quenches;
 - (5) one (1) post wash/dry unit;
 - (6) two (2) natural gas-fired tempering furnaces, each rated at 0.18 MMBtu/hr;
 - (7) four (4) electric tempering furnaces; and
 - (8) six (6) cooling chambers.

- (m) Oil Quench Line 6 (OQ6), identified EU-35, for the heat treatment of metal fasteners, at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V32, V35A, V35B & V35C, and consisting of:
 - (A) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr;

 - (B) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;

 - (C) One (1) natural gas fired tempering furnace, rated at 0.16MMBtu/hr;

- (n) Two (2) electric annealing batch ovens (LAN), identified as EU-36a & EU-36b, constructed in 2007, uncontrolled, and exhausting to stacks V36a & V36b. Each unit has a maximum processing capacity of 3100 pounds of fasteners per day.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, F059-21946-00024, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6]

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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)]

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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date 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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance 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]

- (a) All terms and conditions of permits established prior to F059-21946-00024 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Indiana Department of Environmental Management
Compliance 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]

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

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

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

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

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3.

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
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 and 326 IAC 2-8-11.1.

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
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 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
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The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

C.9 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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:

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no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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- (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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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

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 Descriptions:

- (a) Fifty-seven (57) head forming machines and two (2) nut forming machines, identified as EU-6, constructed between 1996 and 2007, each processing a maximum of 12,000 fasteners per hour, each controlled by a Smog Hog Electrostatic Precipitator, twenty-nine of the head forming machines exhausting to stacks V6:1-9 and the remaining machines exhausting within the building;
- (b) Dacrotizing Coating Line 1, identified as DC1, constructed in 1996, modified in 2009 and approved for modification in 2010, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
- (1) One (1) cleaner wash and natural gas fired dry-off oven (DC1), identified as EU-7, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V7A and V7B.
 - (2) Two (2) SBL shot blasters (DC1), identified as EU-8a and EU-8b, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
 - (3) One (1) dacrotizing metal treatment process (DC1), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V9-2;
 - (4) One (1) natural gas fired dacrotizing oven, identified as EU-9a, each rated at 1.0 MMBtu/hr, uncontrolled, and exhausting to stacks V9 and V9-1;
 - (5) One (1) dacrotizing metal treatment process (DC1), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V9-2;
- (c) Barrel Zinc Plating Line 1, identified as BZ1, constructed in 1996, for the application of zinc and chrome coatings to ferrous based metal fasteners, and consisting of:
- (1) One (1) electric zinc plating oven, identified as EU-10, uncontrolled, and exhausting to stack V10;
 - (2) One (1) zinc plating/trivalent chromium treatment dip process, identified as EU-12, coating a maximum of 2,700 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V12;
- Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.
- (d) Dacrotizing Coating Line 2, formerly identified as DC2 and re-identified as DS2, constructed in 2002, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
- (1) Two (2) SBL shot blasters (DC2), identified as EU-20a, and EU-20b, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;

- (2) One (1) cleaner wash and natural gas fired dry-off oven (DC2), identified as EU-21, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V21A and V21B.
 - (3) One (1) dip coating operation and natural gas fired dry-off oven (DC2), identified as EU-22, rated at 0.7 MMBtu/hr, processing a maximum of 660 pounds of fasteners per hour, uncontrolled, and exhausting to stacks V22-A and V22-B; [326 IAC 8-2-9]
- (e) Barrel Zinc Plating Line 2, identified as BZ2, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the following:
- (1) One (1) electric zinc plating oven, identified as EU-10, constructed in 1996, uncontrolled, and exhausting to stack V27;
 - (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-27, constructed in 2002, coating a maximum of 2,700 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V26; [326 IAC 8-2-9]
- Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.
- (f) Dacrotizing Line 3, identified as DS3, approved for construction in 2009, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
- (1) One (1) SBL shot blaster (DS3), identified as EU-37, with a combined maximum throughput of 343 Pounds of fasteners per hour and 560 lbs per hour of steel shot. EU-37 will be controlled by one (1) baghouse that is exhausted through stack V37.
 - (2) One (1) dip coating operation (DS3), identified as EU-38, with a maximum throughput of 660 pounds of fasteners per hour, uncontrolled, and exhausting inside the building.
 - (3) One (1) natural gas fired pre-cure oven (DS3), identified as EU-39, with one (1) burner rated at 0.14 MMBtu/hr, uncontrolled, and exhausted through stack V39.
 - (4) One (1) natural gas fired cure oven (DS3) with a cooling zone, identified as EU-40, with six (6) burners rated at 0.16 MMBtu/hr and exhausted through stacks V40a & V40b.
- (g) Barrel Zinc plating line 3, identified as BZ3, approved for construction in 2009, for the application of zinc and chrome coatings to ferrous based metal fasteners, and including the following:
- (1) One (1) alkaline zinc plating and trivalent chromium treatment dip process, identified as EU-41, containing no VOC's, coating a maximum of 3000 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V41;
- Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

Insignificant Activities:

- (d) Two (2) natural gas fired boilers, identified as EU-15, and EU-15-1, constructed in 1996, each rated at 2.1 MMBtu/hr, uncontrolled, and exhausting to stacks V15 and V15-1; [326 IAC 6-2-4]
- (e) One (1) natural gas fired boiler, identified as EU-16, rated at 1.2 MMBtu/hr, constructed in 1996, uncontrolled, and exhausting to stack V16; [326 IAC 6-2-4]

(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 PSD Limits [326 IAC 2-2]

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) PM emissions from the from the fifty seven (57) head forming machines and two (2) nut forming machines (EU-6) shall not exceed two hundred forty-four thousandths (0.244) pounds per hour, each;
- (2) PM emissions from the from the four (4) shotblast units (EU-8a, EU-8b, EU-20a and EU-20b) shall not exceed two and seventeen hundredths (2.17) pounds per hour, each; and
- (3) PM emissions from the one (1) shotblast unit (EU-37) shall not exceed two and forty-one hundredths (2.41) pounds per hour.

Compliance with these limits, 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 two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from three (3) natural gas-fired boilers (EU-15, EU-15-1 and EU-16), rated at 2.1, 2.1 and 1.2 MMBtu/hr, respectively, shall not exceed 0.6 pounds per MMBtu heat input.

D.1.3 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from shot blasters EU-8a, EU-8b, EU-20a and EU-20b shall not exceed 2.17 pounds per hour each when they are operating at a process weight rate of 773, 773, 775 and 775 pounds per hour, respectively.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from shot blaster EU-37 shall not exceed 2.41 pounds per hour when operating at a process weight rate of 903 pounds per hour.

The pound 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.1.4 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM-10 emissions from the fifty seven (57) head forming machines and two (2) nut forming machines (EU-6) shall be limited to 0.244 pounds per hour, each, including both filterable and condensable fractions.

Compliance with these limits combined with potential PM10 emissions from other emission units shall limit PM10 emissions to less than 100 tons and render the Part 70 rules (326 IAC 2-7) not applicable.

D.1.5 Particulate Matter Less Than Two and Five Tenths Microns (PM-2.5) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM-2.5 emissions from the fifty seven (57) head forming machines and two (2) nut forming machines (EU-6) shall be limited to 0.244 pounds per hour, each, including both filterable and condensable fractions.

Compliance with these limits combined with potential PM2.5 emissions from other emission units shall limit PM2.5 emissions to less than 100 tons and render the requirements of Part 70 Permits (326 IAC 2-7) not applicable.

D.1.6 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water from each of emission units EU-22 and EU-38, as delivered to the applicator.

(b) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water from each of emission units EU-9 and EU-9b, as delivered to the applicator.

(c) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from units EU-9 and EU-9b shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids. Equivalent VOC emission limit was calculated using the following equation:

$$E = L/(1-L/D)$$

Where:

E = Equivalent emission limit in pounds of VOC per gallon of coating solids, as applied.

L = Applicable emission limit from Article 8 in pounds of VOC per gallon of coating.

D = Baseline solvent density of VOC in the coating, which is equal to 7.36 pounds of VOC per gallon of solvent.

Using the above equation, the pound of VOC per gallon of coating solids shall be limited to less than 6.67 pounds of VOC per gallon of coating solids.

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 38.7%

D.1.7 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

The zinc plating/chromate treatment dip processes identified as EU-12 and EU-27 shall be limited such that the actual VOC emissions from each emission unit shall not exceed fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-9 will not apply to emission units EU-12 and EU-27.

D.1.8 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), when using solvents for clean-up at emission units EU-22, EU-9, and EU-38 all solvents sprayed from the emission units EU-22, EU-9, EU-9b, and EU-38 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.9 Hazardous Air Pollutants (HAP) [326 IAC 2-8] [326 IAC 2-4.1]

- (a) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall not exceed ten (10) tons per twelve (12) consecutive month period; and
- (b) The potential to emit any combination of HAPs from the entire source shall not exceed twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with these limits shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

Compliance Determination Requirements

D.1.10 Particulate Control

- (a) In order to comply with Conditions D.1.3 D.1.4, D.1.5, and D.1.9 the baghouse for particulate control shall be in operation and control emissions from each of the abrasive blasting processes at all times that any of the abrasive blasting processes is in operation. The electrostatic precipitators for particulate control shall be in operation and control emissions from each of the head forming machines at all times that any of the head forming machines are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.11 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.6(a), D.1.7 and D.1.8 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.12 VOC Control [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and to comply with Condition D.1.6(b), the Permittee shall operate the thermal oxidizer at all times coating lines EU-9 and EU-9b are in operation.

D.1.13 Testing Requirements [326 IAC 2-8-5(a)(1)(4)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency in Condition D.1.6(b) and (c) for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.14 Visible Emissions Notations

- (a) Visible emissions notations of the abrasive blasting stack exhaust 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.1.15 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average. From the date of startup until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of at least 1,400 degrees Fahrenheit.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.6(b), as approved by IDEM.

- (c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliance stack test.

D.1.16 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across each of the baghouses used in conjunction with each of the abrasive blasting processes (EU-8a, EU-8b, EU-20a, EU-20b and EU-37), at least once per day when any of the abrasive blasting processes are in operation. When for any one reading, the pressure drop across each of the baghouses 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 or 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 Condition D.1.6.
- (b) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits established in the permit.
- (c) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

The instrument(s) 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.1.17 Broken or Failed Bag Detection

- (a) For a single compartment baghouse 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 line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.18 Record Keeping Requirements

- (a) To document compliance with conditions D.1.6 and D.1.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.1.6, and D.1.8.

- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis:
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The total VOC usage for each month.
 - (4) The monthly cleanup solvent usage.
- (b) To document compliance with conditions D.1.7, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.1.7.
- (1) The total VOC usage for each day; and
- (c) To document compliance with Condition D.1.14, the Permittee shall maintain a daily record of visible emission notations of the abrasive blasting stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (d) To document compliance with Condition D.1.15, the Permittee shall maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (e) To document compliance with Condition D.1.16, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the abrasive blasting process. 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, (e.g., the process did not operate that day).
- (f) To document compliance with Condition D.1.16, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizer. The Permittee shall include in its daily record when the duct pressure or fan amperage is not taken and the reason for the lack of the reading (e.g. the process did not operate that day).
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.19 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION E.1

FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1): Plating and Polishing Operations

- (c) Barrel Zinc Plating Line 1, identified as BZ1, constructed in 1996, for the application of zinc and chrome coatings to ferrous based metal fasteners, and consisting of:
- (1) One (1) electric zinc plating oven, identified as EU-10, uncontrolled, and exhausting to stack V10;
 - (2) One (1) zinc plating/trivalent chromium treatment dip process, identified as EU-12, coating a maximum of 2,700 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V12;
- Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.
- (e) Barrel Zinc Plating Line 2, identified as BZ2, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the following:
- (1) One (1) electric zinc plating oven, identified as EU-10, constructed in 1996, uncontrolled, and exhausting to stack V27;
 - (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-27, constructed in 2002, coating a maximum of 2,700 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V26; [326 IAC 8-2-9]
- Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.
- (g) Barrel Zinc plating line 3, identified as BZ3, approved for construction in 2009, for the application of zinc and chrome coatings to ferrous based metal fasteners, and including the following:
- (1) One (1) alkaline zinc plating and trivalent chromium treatment dip process, identified as EU-41, containing no VOC's, coating a maximum of 3000 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V41;
- Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

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

E.1.1 National Emission Standards for Hazardous Air Pollutants (NESHAPs): Area Source Standards for Plating and Polishing Operations [40 CFR 63, Subpart WWWW] [326 IAC 20]

The Permittee, that owns or operates a plating and polishing facility, as defined in 40 CFR 63.11504, that is an area source of plating and polishing metal hazardous air pollutant (HAP) emissions, as defined in 40 CFR 63.11511, shall comply with the following provisions of

40 CFR Part 63, Subpart WWWW (included as Attachment A of this permit), with a compliance date of July 1, 2010:

The three (3) barrel zinc plating lines (BZ1-BZ3), each, are therefore subject to the following portions of Subpart 6W:

- (1) § 63.11504(a)(1)(iii), (a)(2), (a)(3);
- (2) § 63.11505(a)(1), (b), (e);
- (3) § 63.11506(a);
- (4) § 63.11507(g);
- (5) § 63.11508(a), (b), (d)(1), (d)(2), (d)(8)
- (6) § 63.11509(a), (b), (c)(6), (c)(7), (d), (e), (f)
- (7) § 63.11510
- (8) § 63.11511
- (9) § 63.11512

Nonapplicable portions of the NESHAP are not included in the permit.

The requirements of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart WWWW.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Indiana Automotive Fastener, Inc.
Source Address: 1300 West Anderson Boulevard, Greenfield, IN 46140
Mailing Address: 1300 West Anderson Boulevard, Greenfield, IN 46140
FESOP Permit No.: F059-21946-00024

**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: Indiana Automotive Fastener, Inc.
Source Address: 1300 West Anderson Boulevard, Greenfield, IN 46140
Mailing Address: 1300 West Anderson Boulevard, Greenfield, IN 46140
FESOP Permit No.: F059-21946-00024

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Monthly Report

Source Name: Indiana Automotive Fastener, Inc.
Source Address: 1300 West Anderson Boulevard, Greenfield, IN 46140
Mailing Address: 1300 West Anderson Boulevard, Greenfield, IN 46140
FESOP Permit No.: F059-21946-00024
Facility: Emission Units EU-12 and EU-27
Parameter: VOC Emissions
Limit: Less than 15 lbs per day

Month: _____ Year: _____

| Day | | Day | |
|-----|--|-----|--|
| 1 | | 17 | |
| 2 | | 18 | |
| 3 | | 19 | |
| 4 | | 20 | |
| 5 | | 21 | |
| 6 | | 22 | |
| 7 | | 23 | |
| 8 | | 24 | |
| 9 | | 25 | |
| 10 | | 26 | |
| 11 | | 27 | |
| 12 | | 28 | |
| 13 | | 29 | |
| 14 | | 30 | |
| 15 | | 31 | |
| 16 | | | |

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Indiana Automotive Fastener, Inc.
Source Address: 1300 West Anderson Boulevard, Greenfield, IN 46140
Mailing Address: 1300 West Anderson Boulevard, Greenfield, IN 46140
FESOP Permit No.: F059-21946-00024

Months: _____ to _____ Year: _____

Page 1 of 2

| | |
|---|--------------------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p> | |
| <p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p> | |
| <p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p> | |
| <p>Permit Requirement (specify permit condition #)</p> | |
| <p>Date of Deviation:</p> | <p>Duration of Deviation:</p> |
| <p>Number of Deviations:</p> | |
| <p>Probable Cause of Deviation:</p> | |
| <p>Response Steps Taken:</p> | |
| <p>Permit Requirement (specify permit condition #)</p> | |
| <p>Date of Deviation:</p> | <p>Duration of Deviation:</p> |
| <p>Number of Deviations:</p> | |
| <p>Probable Cause of Deviation:</p> | |
| <p>Response Steps Taken:</p> | |

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**FEDERALLY ENFORCEABLE
STATE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Indiana Automotive Fasteners, Inc.
1300 West Anderson Boulevard
Greenfield, Indiana 46140**

Attachment A

Title 40: Protection of Environment

**PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR
POLLUTANTS FOR SOURCE CATEGORIES**

**Subpart WWWW - Area Source Standards
for Plating and Polishing Operations**

F059 21946 00024

40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Source: 73 FR 37741, July 1, 2008, unless otherwise noted.

Applicability and Compliance Dates

§ 63.11504. Am I subject to this subpart?

- (a) You are subject to this subpart if you own or operate a plating and polishing facility that is an area source of hazardous air pollutant (HAP) emissions and meets the criteria specified in paragraphs (a)(1) through (3) of this section.
- (1) A plating and polishing facility is a plant site that is engaged in one or more of the processes listed in paragraphs (a)(1)(i) through (vi) of this section.
 - (i) Electroplating other than chromium electroplating (i.e., non-chromium electroplating).
 - (ii) Electroless or non-electrolytic plating.
 - (iii) Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying.
 - (iv) Dry mechanical polishing of finished metals and formed products after plating.
 - (v) Electroforming.
 - (vi) Electropolishing.
 - (2) An area source of HAP emissions is any stationary source or group of stationary sources within a contiguous area under common control that does not have the potential to emit any single HAP at a rate of 9.07 megagrams per year (Mg/yr) (10 tons per year (tpy)) or more and any combination of HAP at a rate of 22.68 Mg/yr (25 tpy) or more.
 - (3) Your plating and polishing facility uses or has emissions of compounds of one or more plating and polishing metal HAP, which means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, as defined in §63.11511, "What definitions apply to this subpart?" With the exception of lead, plating and polishing metal HAP also include any of these metals in the elemental form.
- (b) [Reserved]

§ 63.11505. What parts of my plant does this subpart cover?

- (a) This subpart applies to each new or existing affected source, as specified in paragraphs (a)(1) through (3) of this section, at all times.. A new source is defined in §63.11511, "What definitions apply to this subpart?"
- (1) Each tank that contains one or more of the plating and polishing metal HAP, as defined in §63.11511, "What definitions apply to this subpart?", and is used for non-chromium electroplating; electroforming; electropolishing; electroless plating or other non-electrolytic metal coating operations, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.
 - (2) Each thermal spraying operation that applies one or more of the plating and polishing metal HAP, as defined in §63.11511, "What definitions apply to this subpart?"
 - (3) Each dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP, as defined in §63.11511, "What definitions apply to this subpart?"
- (b) An affected source is existing if you commenced construction or reconstruction of the affected source on or before March 14, 2008.
- (c) An affected source is new if you commenced construction or reconstruction of the affected source

after March 14, 2008.

- (d) This subpart does not apply to any of the process units or operations described in paragraphs (d)(1) through (6) of this section.
- (1) Process units that are subject to the requirements of 40 CFR part 63, subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks).
 - (2) Research and development process units, as defined in §63.11511, "What definitions apply to this subpart?"
 - (3) Process units that are used strictly for educational purposes.
 - (4) Thermal spraying conducted to repair surfaces.
 - (5) Dry mechanical polishing conducted to restore the original finish to a surface to apply to restoring the original finish.
 - (6) Any plating or polishing process that does not use any material that contains cadmium, chromium, lead, or nickel in amounts of 0.1 percent or more by weight, or that contains manganese in amounts of 1.0 percent or more by weight, as reported on the Material Safety Data Sheet for the material.
- (e) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, "Title V," provided you are not otherwise required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

§ 63.11506. What are my compliance dates?

- (a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart no later than July 1, 2010.
- (b) If you own or operate a new affected source for which the initial startup date is on or before July 1, 2008, you must achieve compliance with the provisions of this subpart no later than July 1, 2008.
- (c) If you own or operate a new affected source for which the initial startup date is after July 1, 2008, you must achieve compliance with the provisions of this subpart upon initial startup of your affected source.

Standards and Compliance Requirements

§ 63.11507. What are my standards and management practices?

- (a) If you own or operate an affected new or existing non-cyanide electroplating, electroforming, or electropolishing tank (hereafter referred to as an "electrolytic" process tank, as defined in §63.11511, "What definitions apply to this subpart?") that contains one or more of the plating and polishing metal HAP and operates at a pH of less than 12, you must comply with the requirements in paragraph (a)(1), (2), or (3) of this section, and implement the applicable management practices in paragraph (g) of this section, as practicable.
 - (1) You must use a wetting agent/fume suppressant, as defined in §63.11511, "What definitions apply to this subpart?", in the bath of the affected tank according to paragraphs (a)(1)(i) through (iii) of this section.
 - (i) You must initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process.
 - (ii) You must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.

- (iii) If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressants to the tank to comply with this rule.
 - (2) You must capture and exhaust emissions from the affected tank to any one of the following emission control devices: composite mesh pad, packed bed scrubber, or mesh pad mist eliminator, according to paragraphs (a)(2)(i) and (ii) of this section.
 - (i) You must operate all capture and control devices according to the manufacturer's specifications and operating instructions.
 - (ii) You must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
 - (3) You must cover the tank surface according to paragraph (a)(3)(i) or (ii) of this section.
 - (i) For batch electrolytic process tanks, as defined in §63.11511, "What definitions apply to this subpart?", you must use a tank cover, as defined in §63.11511, over all of the effective surface area of the tank for at least 95 percent of the electrolytic process operating time.
 - (ii) For continuous electrolytic process tanks, as defined in §63.11511, "What definitions apply to this subpart?", you must cover at least 75 percent of the surface of the tank, as defined in §63.11511, whenever the electrolytic process tank is in operation.
- (b) If you own or operate an affected new or existing "flash" or short-term electroplating tank, as defined in §63.11511, "What definitions apply to this subpart?", that uses or emits one or more of the plating and polishing metal HAP, you must comply with the requirements specified in paragraph (b)(1) or (b)(2), and implement the applicable management practices in paragraph (g) of this section, as practicable.
 - (1) You must limit short-term or "flash" electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.
 - (2) You must use a tank cover, as defined in §63.11511, "What definitions apply to this subpart?", for at least 95 percent of the plating time.
- (c) If you own or operate an affected new or existing process tank that is used both for short-term electroplating and for electrolytic processing of longer duration (i.e., processing that does not meet the definition of short-term or flash electroplating) and contains one or more of the plating and polishing metal HAP, you must meet the requirements specified in paragraph (a) or (b) of this section, whichever apply to the process operation, and implement the applicable management practices in paragraph (g) of this section, as practicable.
- (d) If you own or operate an affected new or existing electroplating tank that uses cyanide in the plating bath, operates at pH greater than or equal to 12, and contains one or more of the plating and polishing metal HAP, you must comply with the requirements in paragraphs (d)(1) and (2) of this section:
 - (1) You must measure and record the pH of the tank upon start-up. No additional pH measurements are required.
 - (2) You must implement the applicable management practices in paragraph (g) of this section, as practicable.
- (e) If you own or operate an affected new or existing dry mechanical polishing equipment that emits one or more of the plating and polishing metal HAP, you must operate a capture system that captures particulate matter (PM) emissions from the dry mechanical polishing process and transports the emissions to a cartridge, fabric, or high efficiency particulate air (HEPA) filter, according to paragraphs (e)(1) and (2) of this section.

- (1) You must operate all capture and control devices according to the manufacturer's specifications and operating instructions.
 - (2) You must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- (f) If you own or operate an affected thermal spraying operation that applies one or more of the plating and polishing metal HAP, you must meet the applicable requirements specified in paragraphs (f)(1) through (3) of this section, and the applicable management practices in paragraph (g) of this section.
- (1) For existing permanent thermal spraying operations, you must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a water curtain, fabric filter, or HEPA filter, according to paragraphs (f)(1)(i) and (ii) of this section.
 - (i) You must operate all capture and control devices according to the manufacturer's specifications and instructions.
 - (ii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
 - (2) For new permanent thermal spraying operations, you must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a fabric or HEPA filter, according to paragraphs (f)(2)(i) and (ii) of this section.
 - (i) You must operate all capture and control devices according to the manufacturer's specifications and instructions.
 - (ii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
 - (3) For temporary thermal spraying operations, as defined in §63.11511 "What definitions apply to this subpart?", you must meet the applicable requirements specified in paragraphs (f)(3)(i) and (ii) of this section.
 - (i) You must document the amount of time the thermal spraying occurs each day, and where it is conducted.
 - (ii) You must implement the applicable management practices specified in paragraph (g) of this section, as practicable.
- (g) If you own or operate an affected new or existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP, you must implement the applicable management practices in paragraphs (g)(1) through (12) of this section, as practicable.
- (1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
 - (2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
 - (3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
 - (4) Use tank covers, if already owned and available at the facility, whenever practicable.
 - (5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
 - (6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
 - (7) Minimize bath contamination, such as through the prevention or quick recovery of

dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.

- (8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- (9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- (10) Minimize spills and overflow of tanks, as practicable.
- (11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- (12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

§ 63.11508. What are my compliance requirements?

- (a) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with §63.11509(b) of "What are my notification, reporting, and recordkeeping requirements?"
- (b) You must be in compliance with the applicable management practices and equipment standards in this subpart at all times.
- (c) To demonstrate initial compliance, you must satisfy the requirements specified in paragraphs (c)(1) through (11) of this section.
 - (1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(1)(i) through (iv) of this section.
 - (i) You must add wetting agent/fume suppressant to the bath of each affected tank according to manufacturer's specifications and instructions.
 - (ii) You must state in your Notification of Compliance Status that you add wetting agent/fume suppressant to the bath according to manufacturer's specifications and instructions.
 - (iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
 - (iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
 - (2) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a control system, as defined in §63.11511, "What definitions apply to this subpart?", to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(2)(i) through (v) of this section.
 - (i) You must install a control system designed to capture emissions from the affected tank and exhaust them to a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator.
 - (ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions.

- (iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
 - (iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
 - (v) You must follow the manufacturer's specifications and operating instructions for the control systems at all times.
- (3) If you own or operate an affected batch electrolytic process tank, as defined in §63.11511, "What definitions apply to this subpart?", that contains one or more of the plating and polishing metal HAP and which is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a tank cover, as defined in §63.11511, to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(3)(i) through (iv) of this section.
- (i) You must install a tank cover on the affected tank.
 - (ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.
 - (iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
 - (iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
- (4) If you own or operate an affected continuous electrolytic process tank, as defined in §63.11511, "What definitions apply to this subpart?", that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you cover the tank surface to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(4)(i) through (iv) of this section.
- (i) You must cover at least 75 percent of the surface area of the affected tank.
 - (ii) You must state in your Notification of Compliance Status that you operate the tank with the surface cover in place whenever the continuous electrolytic process is in operation.
 - (iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
 - (iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
- (5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?", and you comply with this subpart by limiting the plating time of the affected tank, you must demonstrate initial compliance according to paragraphs (c)(5)(i) through (iii) of this section.
- (i) You must state in your Notification of Compliance Status that you limit short-term or flash electroplating to no more than 1 cumulative hour per day, or 3 cumulative minutes per hour of plating time.
 - (ii) You must implement the applicable management practices specified in

- §63.11507(g), "What are my standards and management practices?", as practicable.
- (iii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
- (6) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?", and you comply by operating the affected tank with a cover, you must demonstrate initial compliance according to paragraphs (c)(6)(i) through (iv) of this section.
- (i) You must install a tank cover on the affected tank.
 - (ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the plating time.
 - (iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
 - (iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
- (7) If you own or operate an affected tank that contains one or more of the plating and polishing metal HAP, uses cyanide in the bath, and is subject to the management practices specified in §63.11507(d), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(7)(i) through (iii) of this section.
- (i) You must report in your Notification of Compliance Status the pH of the bath solution that was measured at start-up, according to the requirements of §63.11507(d)(1).
 - (ii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
 - (iii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11490(g), "What are my standards and management practices?", as practicable.
- (8) If you own or operate an affected dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(e), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(8)(i) through (iii) of this section.
- (i) You must install a control system that is designed to capture PM emissions from the polishing operation and exhaust them to a cartridge, fabric, or HEPA filter.
 - (ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions.
 - (iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- (9) If you own or operate an existing affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(f)(1), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(9)(i) through (iii) of

this section.

- (i) You must install a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a water curtain, fabric filter, or HEPA filter.
 - (ii) You must state in your Notification of Compliance Status that you have installed and are operating the control system according to the manufacturer's specifications and instructions.
 - (iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- (10) If you own or operate a new affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(f)(2), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(10)(i) through (iii) of this section.
- (i) You must install and operate a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a fabric or HEPA filter.
 - (ii) You must state in your Notification of Compliance Status that you have installed and operate the control system according to the manufacturer's specifications and instructions.
 - (iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- (11) If you own or operate an affected temporary thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(f)(3), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(11)(i) and (ii) of this section.
- (i) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
 - (ii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.
- (d) To demonstrate continuous compliance with the applicable management practices and equipment standards specified in this subpart, you must satisfy the requirements specified in paragraphs (d)(1) through (8) of this section.
- (1) You must always operate and maintain your affected source, including air pollution control equipment.
 - (2) You must prepare an annual compliance certification according to the requirements specified in §63.11509(c), "Notification, Reporting, and Recordkeeping," and keep it in a readily-accessible location for inspector review.
 - (3) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate continuous compliance according to paragraphs (d)(3)(i) through (iii) of this section.
 - (i) You must record that you have added the wetting agent/fume suppressant to the tank bath in the original make-up of the tank.
 - (ii) For tanks where the wetting agent/fume suppressant is a separate purchased

- ingredient from the other tank additives, you must demonstrate continuous compliance according to paragraphs (d)(3)(ii) (A) and (B) this section.
- (A) You must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.
 - (B) You must record each addition of wetting agent/fume suppressant to the tank bath.
- (iii) You must state in your annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.
- (4) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a control system to comply with this subpart; an affected dry mechanical polishing operation that is subject to §63.11507(e); or an affected thermal spraying operation that is subject to §63.11507(f)(1) or (2), you must demonstrate continuous compliance according to paragraphs (d)(4)(i) through (v) of this section.
- (i) You must operate and maintain the control system according to the manufacturer's specifications and instructions.
 - (ii) Following any malfunction or failure of the capture or control devices to operate properly, you must take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions.
 - (iii) You must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions.
 - (iv) You must record the results of all control system inspections, deviations from proper operation, and any corrective action taken.
 - (v) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- (5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?", and you comply with this subpart by limiting the plating time for the affected tank, you must demonstrate continuous compliance according to paragraphs (d)(5)(i) through (iii) of this section.
- (i) You must limit short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.
 - (ii) You must record the times that the affected tank is operated each day.
 - (iii) You must state in your annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.
- (6) If you own or operate an affected batch electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements of §63.11507(a), "What are my standards and management practices?", or a flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), and you comply by operating the affected tank with a cover, you must demonstrate continuous compliance according to paragraphs (d)(6)(i) through (iii) of this section.
- (i) You must operate the tank with the cover in place at least 95 percent of the

- electrolytic process operating time.
- (ii) You must record the times that the tank is operated and the times that the tank is covered on a daily basis.
 - (iii) You must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.
- (7) If you own or operate an affected continuous electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you cover your tanks to comply with this subpart, you must demonstrate continuous compliance according to paragraphs (d)(7)(i) and (ii) of this section.
- (i) You must operate the tank with at least 75 percent of the surface covered during all periods of electrolytic process operation.
 - (ii) You must state in your annual certification that you have operated the tank with 75 percent of the surface covered during all periods of electrolytic process operation.
- (8) If you own or operate an affected tank or other operation that is subject to the management practices specified in §63.11507(g), "What are my standards and management practices?", you must demonstrate continuous compliance according to paragraphs (d)(8)(i) and (ii) of this section.
- (i) You must implement the applicable management practices during all times that the affected tank or process is in operation.
 - (ii) You must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

§ 63.11509. What are my notification, reporting, and recordkeeping requirements?

- (a) If you own or operate an affected source, as defined in §63.11505(a), "What parts of my plant does this subpart cover?", you must submit an Initial Notification in accordance with paragraphs (a)(1) through (4) of this section by the dates specified.
- (1) The Initial Notification must include the information specified in §63.9(b)(2)(i) through (iv) of the General Provisions of this part.
 - (2) The Initial Notification must include a description of the compliance method (e.g. , use of wetting agent/fume suppressant) for each affected source.
 - (3) If you start up your affected source on or before July 1, 2008, you must submit an Initial Notification not later than 120 calendar days after July 1, 2008.
 - (4) If you start up your new affected source after July 1, 2008, you must submit an Initial Notification not later than 120 calendar days after you become subject to this subpart.
- (b) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with paragraphs (b)(1) and (2) of this section.
- (1) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in §63.11506, "What are my compliance dates?"
 - (2) The Notification of Compliance Status must include the items specified in paragraphs (b)(2)(i) through (iv) of this section.
 - (i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources.
 - (ii) Methods used to comply with the applicable management practices and equipment standards.
 - (iii) Description of the capture and emission control systems used to comply with the

applicable equipment standards.

- (iv) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements.
- (c) If you own or operate an affected source, you must prepare an annual certification of compliance report according to paragraphs (c)(1) through (7) of this section. These reports do not need to be submitted unless a deviation from the requirements of this subpart has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report.
- (1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that is subject to the requirements in §63.11507(a)(1), "What are my standards and management practices?", you must state in your annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.
 - (2) If you own or operate any one of the affected sources listed in paragraphs (c)(2)(i) through (iii) of this section, you must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions.
 - (i) Electroplating, electroforming, or electropolishing tank that is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a control system to comply with this subpart;
 - (ii) Dry mechanical polishing operation that is subject to §63.11507(e); or
 - (iii) Permanent thermal spraying operation that is subject to §63.11507(f)(1) or (2).
 - (3) If you own or operate an affected flash or short-term electroplating tank that is subject to the requirements in §63.11507(b), "What are my standards and management practices?", and you comply with this subpart by limiting the plating time of the affected tank, you must state in your annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.
 - (4) If you own or operate an affected batch electrolytic process tank that is subject to the requirements of §63.11507(a) or a flash or short-term electroplating tank that is subject to the requirements in §63.11507(b), "What are my standards and management practices?", and you comply by operating the affected tank with a cover, you must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.
 - (5) If you own or operate an affected continuous electrolytic process tank that is subject to the requirements of §63.11507(a), "What are my standards and management practices?", and you comply by operating the affected tank with a cover, you must state in your annual certification that you have covered at least 75 percent of the surface area of the tank during all periods of electrolytic process operation.
 - (6) If you own or operate an affected tank that is subject to the management practices specified in §63.11507(g), "What are my standards and management practices?", you must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.
 - (7) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.
- (d) If you own or operate an affected source, and any deviations from the compliance requirements specified in this subpart occurred during the year, you must report the deviations, along with the

- corrective action taken, and submit this report to the delegated authority.
- (e) You must keep the records specified in paragraphs (e)(1) through (3) of this section.
- (1) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications.
 - (2) The records specified in §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part.
 - (3) The records required to show continuous compliance with each management practice and equipment standard that applies to you, as specified in §63.11508(d), "What are my compliance requirements?"
- (f) You must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining 3 years.

Other Requirements and Information

§ 63.11510. What General Provisions apply to this subpart?

If you own or operate a new or existing affected source, you must comply with the requirements of the General Provisions (40 CFR part 63, subpart A) according to Table 1 of this subpart.

§ 63.11511. What definitions apply to this subpart?

Terms used in this subpart are defined in this section.

Batch electrolytic process tank means a tank used for an electrolytic process in which a part or group of parts, typically mounted on racks or placed in barrels, is placed in the tank and immersed in an electrolytic process solution as a single unit (i.e., as a batch) for a predetermined period of time, during which none of the parts are removed from the tank and no other parts are added to the tank, and after which the part or parts are removed from the tank as a unit.

Bath means the liquid contents of a tank that is used for electroplating, electroforming, electropolishing, or other metal coating processes at a plating and polishing facility.

Capture system means the collection of components used to capture gases and fumes released from one or more emissions points and then convey the captured gas stream to a control device, as part of a complete control system. A capture system may include, but is not limited to, the following components as applicable to a given capture system design: duct intake devices, hoods, enclosures, ductwork, dampers, manifolds, plenums, and fans.

Cartridge filter means a type of control device that uses perforated metal cartridges containing a pleated paper or non-woven fibrous filter media to remove PM from a gas stream by sieving and other mechanisms. Cartridge filters can be designed with single use cartridges, which are removed and disposed after reaching capacity, or continuous use cartridges, which typically are cleaned by means of a pulse-jet mechanism.

Composite mesh pad means a type of control device similar to a mesh pad mist eliminator except that the device is designed with multiple pads in series that are woven with layers of material with varying fiber diameters, which produce a coalescing effect on the droplets or PM that impinge upon the pads.

Continuous electrolytic process tank means a tank that uses an electrolytic process and in which a continuous metal strip or other type of continuous substrate is fed into and removed from the tank continuously. This process is also called reel-to-reel electrolytic plating.

Control device means equipment that is part of a control system that collects and/or reduces the quantity of a pollutant that is emitted to the air. The control device receives emissions that are transported from the process by the capture system.

Control system means the combination of a capture system and a control device. The capture system is designed to collect and transport air emissions from the affected source to the control device. The overall control efficiency of any control system is a combination of the ability of the system to capture the air emissions (*i.e.* , the capture efficiency) and the control device efficiency. Consequently, it is important to achieve good capture to ensure good overall control efficiency. Capture devices that are known to provide high capture efficiencies include hoods, enclosures, or any other duct intake devices with ductwork, dampers, manifolds, plenums, or fans.

Cyanide plating means plating processes performed in tanks that use cyanide as a major bath ingredient and that operate at pH of 12 or more, and use or emit any of the plating and polishing metal HAP, as defined in this section.. Electroplating and electroforming are performed with or without cyanide.. The cyanide in the bath works to dissolve the HAP metal added as a cyanide compound (e.g., cadmium cyanide) and creates free cyanide in solution, which helps to corrode the anode.. These tanks are self-regulating to a pH of 12 due to the caustic nature of the cyanide bath chemistry.. The cyanide in the bath is a major bath constituent and not an additive; however, the self-regulating chemistry of the bath causes the bath to act as if wetting agents/fume suppressants are being used and to ensure an optimum plating process.. All cyanide plating baths at pH greater than or equal to 12 have cyanide-metal complexes in solution.. The metal HAP to be plated is not emitted because it is either bound in the metal-cyanide complex or reduced at the cathode to elemental metal, and plated onto the immersed parts.. Cyanide baths are not intentionally operated at pH less 12 since unfavorable plating conditions would occur in the tank, among other negative effects.

Deviation means any instance in which an affected source or an owner or operator of such an affected source:

- (1) Fails to meet any requirement or obligation established by this rule including, but not limited to, any equipment standard (including emissions and operating limits), management practice, or operation and maintenance requirement;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this rule and that is included in the operating permit for any affected facility required to obtain such a permit; or
- (3) Fails to meet any equipment standard (including emission and operating limits), management standard, or operation and maintenance requirement in this rule during startup, shutdown, or malfunction.

Dry mechanical polishing means a process used for removing defects from and smoothing the surface of finished metals and formed products after plating with any of the plating and polishing metal HAP, as defined in this section, using hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles.

Electroforming means an electrolytic process using or emitting any of the plating and polishing metal HAP, as defined in this section, that is used for fabricating metal parts. This process is essentially the same as electroplating except that the plated substrate (mandrel) is removed, leaving only the metal plate. In electroforming, the metal plate is self-supporting and generally thicker than in electroplating.

Electroless plating means a non-electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Electroless plating is also called non-electrolytic plating. Examples include, but are not limited to, chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

Electrolytic plating processes means electroplating and electroforming that use or emit any of the plating and polishing metal HAP, as defined in this section, where metallic ions in a plating bath or solution are reduced to form a metal coating on the surface of parts and products using electrical energy.

Electroplating means an electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metal ions in solution are reduced onto the surface of the work piece (the cathode) via an electrical current. The metal ions in the solution are usually replenished by the dissolution of metal from solid metal anodes fabricated of the same metal being plated, or by direct replenishment of the solution with metal salts or oxides; electroplating is also called electrolytic plating.

Electropolishing means an electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a work piece is attached to an anode immersed in a bath, and the metal substrate is dissolved electrolytically, thereby removing the surface contaminant; electropolishing is also called electrolytic polishing.

Fabric filter means a type of control device used for collecting PM by filtering a process exhaust stream through a filter or filter media. A fabric filter is also known as a baghouse.

Flash electroplating means an electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that is used no more than 3 cumulative minutes per hour or no more than 1 cumulative hour per day.

General Provisions of this part (40 CFR part 63, subpart A) means the section of the Code of Federal Regulations (CFR) that addresses air pollution rules that apply to all HAP sources addressed in part 63, which includes the National Emission Standards for Hazardous Air Pollutants (NESHAP).

HAP means hazardous air pollutant as defined from the list of 188 chemicals and compounds specified in the CAA Amendments of 1990; HAP are also called "air toxics." The five plating and polishing metal HAP, as defined in this section, are on this list of 188 chemicals.

High efficiency particulate air (HEPA) filter means a type of control device that uses a filter composed of a mat of randomly arranged fibers and is designed to remove at least 99.97 percent of airborne particles that are 0.3 micrometers or larger in diameter.

Mesh pad mist eliminator means a type of control device, consisting of layers of interlocked filaments densely packed between two supporting grids that remove liquid droplets and PM from the gas stream through inertial impaction and direct interception.

Metal coating operation means any process performed either in a tank that contains liquids or as part of a spraying operation that applies one or more plating and polishing metal HAP, as defined in this section, to parts and products used in manufacturing. These processes include but are not limited to: Non-chromium electroplating; electroforming; electropolishing; other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying.

New source means any affected source for which you commenced construction or reconstruction after March 14, 2008.

Non-cyanide electrolytic plating and electropolishing processes means electroplating, electroforming, and electropolishing that uses or emits any of the plating and polishing metal HAP, as defined in this section, performed without cyanide in the tank. These processes do not use cyanide in the tank and operate at pH values less than 12. These processes use electricity and add or remove metals such as metal HAP from parts and products used in manufacturing. Both electroplating and electroforming can be performed with cyanide as well.

Non-electrolytic plating means a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Non-electrolytic plating is also called electroless plating. Examples include chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

Packed-bed scrubber means a type of control device that includes a single or double packed bed that contains packing media on which PM and droplets impinge and are removed from the gas stream. The packed-bed section of the scrubber is followed by a mist eliminator to remove any water entrained from the packed-bed section.

Plating and polishing facility means a facility engaged in one or more of the following processes that uses or emits any of the plating and polishing metal HAP, as defined in this section: Electroplating processes other than chromium electroplating (i.e., non-chromium electroplating); electroless plating; other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; thermal spraying; and the dry mechanical polishing of finished metals and formed products after plating.

Plating and polishing metal HAP means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. Any material that does not contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight, and does not contain manganese in amounts greater than or equal to 1.0 percent by weight, as reported on the Material Safety Data Sheet for the material, is not considered to be a plating and polishing metal HAP.

Plating and polishing process tanks means any tank in which a process is performed at an affected plating and polishing facility that uses or has the potential to emit any of the plating and polishing metal HAP, as defined in this section. The processes performed in plating and polishing tanks include the following: Electroplating processes other than chromium electroplating (i.e., non-chromium electroplating) performed in a tank; electroless plating; and non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and electropolishing. This term does not include tanks containing solutions that are used to rinse or wash parts prior to placing the parts in a plating and polishing process tank, or subsequent to removing the parts from a plating and polishing process tank. This term also does not include thermal spraying or dry polishing with machines.

PM means solid or particulate matter that is emitted into the air.

Research and development process unit means any process unit that is used for conducting research and development for new processes and products and is not used to manufacture products for commercial sale, except in a *de minimis* manner.

Short-term plating means an electroplating process that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that is used no more than 3 cumulative minutes per hour or 1 hour cumulative per day.

Tank cover for batch process units means a solid structure made of an impervious material that is designed to cover the entire open surface of a tank or process unit that is used for plating or other metal coating processes.

Tank cover for continuous process units, means a solid structure or combination of structures, made of an impervious material that is designed to cover at least 75 percent of the open surface of the tank or process unit that is used for continuous plating or other continuous metal coating processes.

Temporary thermal spraying means a thermal spraying operation that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that lasts no more than 1 hour in duration during any one day and is conducted in situ. Thermal spraying that is conducted in a dedicated thermal spray booth or structure is not considered to be temporary thermal spraying.

Thermal spraying (also referred to as metal spraying or flame spraying) is a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a metallic coating is applied by projecting molten or semi-molten metal particles onto a substrate. Commonly-used thermal spraying methods include high velocity oxy-fuel (HVOF) spraying, flame spraying, electric arc spraying, plasma arc spraying, and detonation gun spraying.

Water curtain means a type of control device that draws the exhaust stream through a continuous curtain of moving water to scrub out suspended PM.

Wetting agent/fume suppressant means any chemical agent that reduces or suppresses fumes or mists from a plating and polishing tank by reducing the surface tension of the tank bath.

§ 63.11512. Who implements and enforces this subpart?

- (a) This subpart can be implemented and enforced by EPA or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency, in addition to EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.
- (b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the State, local, or tribal agency.
- (c) The authorities that cannot be delegated to State, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.
 - (1) Approval of an alternative non-opacity emissions standard under 40 CFR 63.6(g), of the General Provisions of this part.
 - (2) Approval of an alternative opacity emissions standard under §63.6(h)(9), of the General Provisions of this part.
 - (3) Approval of a major change to test methods under §63.7(e)(2)(ii) and (f), of the General Provisions of this part. A “major change to test method” is defined in §63.90.
 - (4) Approval of a major change to monitoring under §63.8(f), of the General Provisions of this part. A “major change to monitoring” is defined in §63.90.
 - (5) Approval of a major change to recordkeeping and reporting under §63.10(f), of the General Provisions of this part. A “major change to recordkeeping/reporting” is defined in §63.90.

§ 63.11513. [Reserved]

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Table 1 to Subpart WWWW of Part 63: Applicability of General Provisions to Plating and Polishing Area Sources

As required in §63.11510, “What General Provisions apply to this subpart?”, you must meet each requirement in the following table that applies to you.

| Citation | Subject |
|---|---|
| 63.1 | Applicability. |
| 63.2 | Definitions. |
| 63.3 | Units and abbreviations. |
| 63.4 | Prohibited activities. |
| 63.6(a), (b)(1)–(b)(5), (c)(1), (c)(2), (c)(5), (j) | Compliance with standards and maintenance requirements. |
| 63.10(a), (b)(1), (b)(2)(i)–(iii), (xiv), (b)(3), (d)(1), (f) | Recordkeeping and reporting. |
| 63.12 | State authority and delegations. |
| 63.13 | Addresses of State air pollution control agencies and EPA regional offices. |
| 63.14 | Incorporation by reference. |
| 63.15 | Availability of information and confidentiality. |

¹Section 63.11505(e), “What parts of my plant does this subpart cover?”, exempts affected sources from the obligation to obtain title V operating permits.

Reference

The US EPA Electronic Code of Federal Regulations - 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations web address: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=e9a08c3e4308b9d8938e9529efbc6b50&rgn=div6&view=text&node=40:14.0.1.1.1.32&idno=40>

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

| | |
|--|---|
| Source Name: | Indiana Automotive Fasteners, Inc. |
| Source Location: | 1300 West Anderson Boulevard, Greenfield, IN 46140 |
| County: | Hancock |
| SIC Code: | 3452 |
| Operation Permit No.: | F059-21946-00024 |
| Operation Permit Issuance Date: | December 17, 2007 |
| Minor Permit Revision No.: | 059-28795-00024 |
| Permit Reviewer: | Jack Harmon |

On November 20, 2009, the Office of Air Quality (OAQ) received an application from Indiana Automotive Fasteners, Inc. related to a modification to an existing stationary automotive nuts and bolts manufacturing plant.

Existing Approvals

The source was issued FESOP No. 059-21946-00024 on December 17, 2007. The source has since received the following approvals:

- (a) Significant Permit Revision No. 059-27527-00024, issued on June 18, 2009; and
- (b) Administrative Amendment No. 059-28502-00024, issued on November 5, 2009.

County Attainment Status

The source is located in Hancock County. The following attainment status designations are applicable to Hancock County:

| Pollutant | Designation |
|--|--|
| PM10 | Unclassifiable effective November 15, 1990. |
| PM2.5 | Unclassifiable or attainment effective April 5, 2005. |
| NO2 | Cannot be classified or better than national standards. |
| SO2 | Better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| O3 | Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹ |
| Pb | Not designated. |
| ¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. | |

- (a) Ozone Standards
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. Hancock 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**
 Hancock 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**
 Hancock 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.

Fugitive Emissions

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

Status of the Existing Source

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

| Process/ Emission Unit | Potential To Emit of the Entire Source Prior to Proposed Revision (tons/year) | | | | | | | | |
|---|---|--------------------|--------------------|-----|-----|-------------------|----|---------------------|----------------------------------|
| | PM* | PM10* | PM2.5* | SO2 | NOx | VOC | CO | Total HAPs | Worst Single HAP |
| Abrasive Blasting (EU-8a, EU-8b,) (EU-20a & EU-20b) and (EU-37) | 48.60 ^α | 17.14 | 17.14 | 0 | 0 | 0 | 0 | 0.66 ^{β,δ} | 0.49 ^{β,δ} Manganese |
| 57 Head Forming & 2 Nut Forming Machines (EU-6) | 63.05 ^α | 63.05 ^β | 63.05 ^β | 0 | 0 | 7.63 | 0 | 0.50 ^{β,δ} | 0.42 ^{β,δ} Manganese |
| Rolling Oil (EU-6) | 0 | 0 | 0 | 0 | 0 | 2.18 | 0 | 0 | 0 |
| DC1 Dacrotizing Line | | | | | | | | | |
| Dip Coating (EU-9) | 0 | 0 | 0 | 0 | 0 | 2.74 ^χ | 0 | 0.26 | 0.14 ^β Naphthalene |
| Dip Coating (EU-9b) | 0 | 0 | 0 | 0 | 0 | 2.73 ^χ | 0 | 0.05 | 0.05 ^β Xylenes |
| DS2 Dacrotizing Line (EU-22) | 0 | 0 | 0 | 0 | 0 | 3.11 | 0 | 1.79 | 1.79 Methanol |
| DS3 Dip Coating Line | | | | | | | | | |
| Dip Coating (EU-38) | 0 | 0 | 0 | 0 | 0 | 3.11 | 0 | 1.79 | 1.79 Methanol |
| BZ1 Barrel Zinc Plating Line | | | | | | | | | |
| Zinc Plating / Chromate Dip (EU-12) | 0 | 0 | 0 | 0 | 0 | 0.03 | 0 | 0.58 ^{β,δ} | 0.39 ^{β,δ} Chromium |
| BZ2 Barrel Zinc Plating Line | | | | | | | | | |
| Zinc Plating / Chromate Dip (EU-27) | 0 | 0 | 0 | 0 | 0 | 0.03 | 0 | 0.58 ^{β,δ} | 0.39 ^{β,δ} Chromium |
| BZ3 Barrel Zinc Plating Line | | | | | | | | | |

| Process/ Emission Unit | Potential To Emit of the Entire Source Prior to Proposed Revision (tons/year) | | | | | | | | |
|---|---|-------------------|--------------------|-------------|-------------|--------------|-------------|-------------------|---|
| | PM ^a | PM10 ^a | PM2.5 ^a | SO2 | NOx | VOC | CO | Total HAPs | Worst Single HAP |
| Zinc Plating / Chromate Dip (EU-41) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.10 ^β | 0.08 ^β Hydrochloric Acid |
| Natural Gas Combustion (multiple units) | 0.13 | 0.54 | 0.40 | 0.04 | 7.09 | 0.39 | 5.95 | 0.13 | 0.13 Hexane |
| Total PTE of Entire Source | 111.79 | 80.73 | 80.59 | 0.04 | 7.09 | 21.94 | 5.95 | 6.45 | 3.61 Methanol |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 25 | 10 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | NA | NA |
| <p>* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". Additionally, US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.</p> <p>^a Potential to emit after PSD limits.</p> <p>^β Potential to emit after FESOP limits.</p> <p>^γ Potential to emit after 326 IAC 8-2-9 limits</p> <p>^δ Potential to emit after controls.</p> <p>> Metal HAPs emissions from the Abrasive Blasting, Fifty-seven (57) Head Forming & two (2) Nut Forming Machines , and coating and plating lines have been added. Metal HAPS, including Cadmium, Chromium, Lead, Manganese and Nickel, are particulate in nature and can be controlled using a control device.</p> | | | | | | | | | |

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Indiana Automotive Fasteners, Inc. on November 20, 2009, relating to the addition of one (1) thermal oxidizer, RTO, with a maximum heat input capacity of 1.7 MMBtu/hour, to be used to control VOC emissions from the two coaters, identified as EU-9 and EU-9b, that are a part of the Dacrotizing Coating Line No. 1, identified as DC1. The exhaust route has been changed from inside the building to exhaust stack V9-2. The source also requests that the fifteen (15) pound per day limit for VOC emissions be removed from the permit and be replaced with the 3.5 pound VOC per gallon of coating limit.

The following is a list of the modified emission unit(s) and pollution control device(s):

- (b) Dacrotizing Coating Line 1, identified as DC1, constructed in 1996, modified in 2009, and approved for modification in 2010, for the application of corrosion resistant coatings to ferrous-based metal fasteners, and consisting of:
 - (3) One (1) dacrotizing metal treatment process (DC1), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer with a maximum heat input capacity of 1.7 MMBtu per hour, and exhausting to stack V9-2;
 - (5) One (1) dacrotizing metal treatment process (DC1), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a

thermal oxidizer with a maximum heat input capacity of 1.7 MMBtu per hour, and exhausting to stack V9-2;

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Process/ Emission Unit | PTE of Proposed Revision (tons/year) | | | | | | | | |
|---------------------------------------|--------------------------------------|-------------|-------------|-----------------|-----------------|--------------|-------------|--------------|-----------------------|
| | PM | PM10* | PM2.5 | SO ₂ | NO _x | VOC** | CO | Total HAPs | Worst Single HAP |
| Thermal Oxidizer serving DC1 Lines | 0.01 | 0.06 | 0.04 | 0.00 | 0.74 | 0.04 | 0.63 | .0140 | .0134 (Hexane) |
| DC1 - Dip Coating EU-9 | 0.31 | 0.31 | 0.31 | 0.0 | 0.0 | 8.74 | 0.0 | 0.0 | 0.0 |
| DC1 - Dip Coating EU-9b | 0.19 | 0.19 | 0.19 | 0.0 | 0.0 | 8.11 | 0.0 | 0.0 | 0.0 |
| Total PTE of Proposed Revision | 0.51 | 0.56 | 0.54 | 0.00 | 0.74 | 16.89 | 0.63 | .0140 | .0134 (Hexane) |

* 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".
 ** This revision reflects a source request to eliminate pound per day limit for Units EU-9 and EU-9b; therefore, this revision results in an increase in the PTE for VOC for those two lines, from 2.74 tpy to 11.47 tpy and 2.73 tpy to 10.85 tpy, respectively .

This FESOP is being revised through a FESOP Minor Permit Revision pursuant to 326 IAC 2-8-11.1(d)(4)(E), because the revision involves a modification with the potential to emit less than 25 tons per year of VOC emissions.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source, reflecting the addition of a thermal oxidizer and removing the limits from DC1 lines, as described above, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

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| Process/ Emission Unit | Potential To Emit of the Entire Source Upon Issuance (tons/year) | | | | | | | | |
|--|--|----------------------------------|----------------------------------|------|--------------------------------|---------------------------------------|--------------------------------|--------------------------------|--|
| | PM* | PM10* | PM2.5* | SO2 | NOx | VOC | CO | Total HAPs | Worst Single HAP |
| Abrasive Blasting (EU-8a, EU-8b,) (EU-20a & EU-20b) and (EU-37) | 48.60 ^α | 17.14 | 17.14 | 0 | 0 | 0 | 0 | 0.66 ^{β,δ} | 0.49 ^{β,δ} Manganese |
| 57 Head Forming & 2 Nut Forming Machines (EU-6) | 63.05 ^α | 63.05 ^β | 63.05 ^β | 0 | 0 | 7.63 | 0 | 0.50 ^{β,δ} | 0.42 ^{β,δ} Manganese |
| Rolling Oil (EU-6) | 0 | 0 | 0 | 0 | 0 | 2.18 | 0 | 0 | 0 |
| DC1 Dacrotizing Line | | | | | | | | | |
| Dip Coating (EU-9) | 0.31 ^α 0 | 0.31 ^β 0 | 0.31 ^β 0 | 0 | 0 | 11.47 2.74 ^ζ | 0 | 0.26 | 0.14 ^β Naphthalene |
| Dip Coating (EU-9b) | 0.19 ^α 0 | 0.19 ^β 0 | 0.19 ^β 0 | 0 | 0 | 10.85 2.73 ^ζ | 0 | 0.05 | 0.05 ^β Xylenes |
| DS2 Dacrotizing Line (EU-22) | 0 | 0 | 0 | 0 | 0 | 3.11 | 0 | 1.79 | 1.79 Methanol |
| DS3 Dip Coating Line | | | | | | | | | |
| Dip Coating (EU-38) | 0 | 0 | 0 | 0 | 0 | 3.11 | 0 | 1.79 | 1.79 Methanol |
| BZ1 Barrel Zinc Plating Line | | | | | | | | | |
| Zinc Plating / Chromate Dip (EU-12) | 0 | 0 | 0 | 0 | 0 | 0.03 | 0 | 0.58 ^{β,δ} | 0.39 ^{β,δ} Chromium |
| BZ2 Barrel Zinc Plating Line | | | | | | | | | |
| Zinc Plating / Chromate Dip (EU-27) | 0 | 0 | 0 | 0 | 0 | 0.03 | 0 | 0.58 ^{β,δ} | 0.39 ^{β,δ} Chromium |
| BZ3 Barrel Zinc Plating Line | | | | | | | | | |
| Zinc Plating / Chromate Dip (EU-41) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.10 ^β | 0.08 ^β Hydrochloric Acid |
| Natural Gas Combustion (multiple units) | 0.14 0.13 | 0.57 0.54 | 0.42 0.40 | 0.04 | 7.45 7.09 | 0.41 0.39 | 6.26 5.95 | 1.41 0.13 | 0.13 Hexane |
| Total PTE of Entire Source | 112.29 111.79 | 81.26 80.73 | 81.11 80.59 | 0.04 | 7.45 7.09 | 38.81 21.94 | 6.26 5.95 | 6.76 6.45 | 3.61 Methanol |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 25 | 10 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | NA | NA |
| negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". Additionally, US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. ^α Potential to emit after PSD limits. ^β Potential to emit after FESOP limits. ^ζ Potential to emit after 326 IAC 8-2-9 limits that were removed as the result of this revision. ^δ Potential to emit after controls. > Metal HAPs emissions from the Abrasive Blasting, Fifty-seven (57) Head Forming & two (2) Nut Forming Machines, and coating and plating lines have been added. Metal HAPs, including Cadmium, Chromium, Lead, Manganese and Nickel, are particulate in nature and can be controlled using a control device. | | | | | | | | | |

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

| Process/ Emission Unit | Potential To Emit of the Entire Source Upon Issuance (tons/year) | | | | | | | | |
|---|--|--------------------|--------------------|-------------|-------------|--------------|-------------|---------------------|--|
| | PM [*] | PM10 [*] | PM2.5 [*] | SO2 | NOx | VOC | CO | Total HAPs | Worst Single HAP |
| Abrasive Blasting (EU-8a, EU-8b,) (EU-20a & EU-20b) and (EU-37) | 48.60 ^α | 17.14 | 17.14 | 0 | 0 | 0 | 0 | 0.66 ^{β,δ} | 0.49 ^{β,δ} Manganese |
| 57 Head Forming & 2 Nut Forming Machines (EU-6) | 63.05 ^α | 63.05 ^β | 63.05 ^β | 0 | 0 | 7.63 | 0 | 0.50 ^{β,δ} | 0.42 ^{β,δ} Manganese |
| Rolling Oil (EU-6) | 0 | 0 | 0 | 0 | 0 | 2.18 | 0 | 0 | 0 |
| DC1 Dacrotizing Line | | | | | | | | | |
| Dip Coating (EU-9) | 0.31 | 0.31 | 0.31 | 0 | 0 | 11.47 | 0 | 0.26 | 0.14 ^β Naphthalene |
| Dip Coating (EU-9b) | 0.19 | 0.19 | 0.19 | 0 | 0 | 10.85 | 0 | 0.05 | 0.05 ^β Xylenes |
| DS2 Dacrotizing Line (EU-22) | 0 | 0 | 0 | 0 | 0 | 3.11 | 0 | 1.79 | 1.79 Methanol |
| DS3 Dip Coating Line | | | | | | | | | |
| Dip Coating (EU-38) | 0 | 0 | 0 | 0 | 0 | 3.11 | 0 | 1.79 | 1.79 Methanol |
| BZ1 Barrel Zinc Plating Line | | | | | | | | | |
| Zinc Plating / Chromate Dip (EU-12) | 0 | 0 | 0 | 0 | 0 | 0.03 | 0 | 0.58 ^{β,δ} | 0.39 ^{β,δ} Chromium |
| BZ2 Barrel Zinc Plating Line | | | | | | | | | |
| Zinc Plating / Chromate Dip (EU-27) | 0 | 0 | 0 | 0 | 0 | 0.03 | 0 | 0.58 ^{β,δ} | 0.39 ^{β,δ} Chromium |
| BZ3 Barrel Zinc Plating Line | | | | | | | | | |
| Zinc Plating / Chromate Dip (EU-41) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.10 ^β | 0.08 ^β Hydrochloric Acid |
| Natural Gas Combustion (multiple units) | 0.14 | 0.57 | 0.42 | 0.04 | 7.45 | 0.41 | 6.26 | 1.41 | 0.13 Hexane |
| Total PTE of Entire Source | 112.29 | 81.26 | 81.11 | 0.04 | 7.45 | 38.81 | 6.26 | 6.76 | 3.61 Methanol |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 25 | 10 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | NA | NA |
| <p>* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". Additionally, US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.</p> <p>^α Potential to emit after PSD limits.</p> <p>^β Potential to emit after FESOP limits.</p> <p>^δ Potential to emit after controls.</p> <p>> Metal HAPs emissions from the Abrasive Blasting, Fifty-seven (57) Head Forming & two (2) Nut Forming Machines, and coating and plating lines have been added. Metal HAPs, including Cadmium, Chromium, Lead, Manganese and Nickel, are particulate in nature and can be controlled using a control device.</p> | | | | | | | | | |

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

There were no new requirements as the result of this revision. However, the source shall continue comply with the PM10 and PM2.5 limits for the Abrasive Blasting and Head and Nut

Forming Machine emission units required in FESOP No. 059-21946-00024, issued on December 17, 2007.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), 326 IAC 2-1.1-5 (Nonattainment New Source Review), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

There were no new requirements as the result of this revision. However, the source shall continue comply with the PM10 and PM2.5 limits for the Abrasive Blasting and Head and Nut Forming Machine emission units required in FESOP No. 059-21946-00024, issued on December 17, 2007.

Compliance with these limits, 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.

| |
|---|
| Federal Rule Applicability Determination |
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New Source Performance Standards (NSPS)

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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.

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| State Rule Applicability Determination |
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The following state rules are applicable to the proposed revision:

(a) 326 IAC 2-8-4 (FESOP)

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP

Revision Section above.

- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new emission unit 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 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.
- (e) 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.
- (f) 326 IAC 8-2 (VOC Rules: Surface Coating Emission Limitations)
The source has proposed to use a thermal oxidizer in order to comply with the emission limit required in 326 IAC 8-2-9, thus eliminating the existing 15 lb/day limits for emission units EU-9 and EU-9b.
- (1) Pursuant to 326 IAC 8-2-9, the source shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water, from emission units EU-9 and EU-9b, as delivered to the applicator.
 - (2) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the DC1 operation, including units EU-9 and EU-9b shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids. Equivalent VOC emission limit was calculated using the following equation:

$$E = L/(1-L/D) = 3.5 / (1-3.5 / 7.36) = 6.67 \text{ pounds of VOC per gallon}$$

Where:

- E = Equivalent emission limit in pounds of VOC per gallon of coating solids, as applied.
L = Applicable emission limit from Article 8 in pounds of VOC per gallon of coating (3.5 pounds of VOC per gallon of coating).
D = Baseline solvent density of VOC in the coating, which is equal to 7.36 pounds of VOC per gallon of solvent.

Using the above equation, the pound of VOC per gallon of coating solids shall be limited to less than 6.67 pounds of VOC per gallon of coating solids.

- (3) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100 = [(10.88 - 6.67) / 10.88] \times 100 = 38.7\% \text{ minimum control efficiency}$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied. This value is 10.88 pounds of VOC per gallon of coating solids, as shown in Appendix A.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied, which is 6.67 pounds per gallon of coating.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 38.7% to comply with 326 IAC 8-2-9 requirements.

- (4) Pursuant to 326 IAC 8-2-9 (f), all solvents from the application equipment of the coating lines during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation..

The source shall also continue to comply with the requirements established in FESOP No. 059-21946-00024, issued December 17, 2007.

| |
|--|
| Compliance Determination, Monitoring and Testing Requirements |
|--|

- (a) Compliance with the VOC content requirements for DC1, units EU-9 and EU-9b operations, shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Pursuant to 326 IAC 8-1-2(a) and to comply with the VOC emission limitations for DC1, units EU-9 and EU-9b, the source shall operate the thermal oxidizer at all times the coating booth is in operation.
- (c) Within one hundred and eighty (180) days after initial startup, the source shall conduct a performance test to verify VOC control efficiency for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.
- (d) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average. From the date of startup until the stack test results are available, the

- source shall operate the thermal oxidizer at or above the 3-hour average temperature of at least 1400 degrees Fahrenheit.
- (e) The source shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits.
 - (f) On and after the date the stack test results are available, the source shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.
 - (g) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits established in the permit.
 - (h) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliance stack test.

The existing compliance requirements will not change as a result of this revision. The source shall also continue to comply with the applicable requirements and permit conditions as contained in FESOP No: 059-21946-00024, issued on December 17, 2007.

Record Keeping Requirements

To document compliance with 326 IAC 8-2-9, the source shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established.

- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (3) The monthly cleanup solvent usage; and
- (4) The total VOC usage for each month.
- (5) The continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliance stack test.
- (6) Daily records of the duct pressure or fan amperage. The source shall include in its daily record when the pressure drop and flow rate are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:
 - (1) The source has requested to install a thermal oxidizer as a control device on two processes on Dacrotizing Coating Line DC1 to control VOC emissions and has changed the routing of

exhaust from inside the building to stack V9-2. The Emission Unit Summary in Section A.2 of the permit has been changed to reflect this change. The Emission Unit Operation Conditions in Section D.1 of the permit has also been changed to reflect this change.

- (2) The source has also requested that the fifteen (15) pound per day limit for VOC emissions be removed from the permit and be replaced with the 3.5 pound VOC per gallon of coating limit to allow for operational flexibility. The corresponding Conditions in Section D.1 of the permit have been changed to reflect the changes to the limits and corresponding compliance determination and reporting requirements associated with this change.

(b) The permit has been changed as follows:

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

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

- (a) ---
- (b) Dacrotizing Coating Line 1, identified as DC1, constructed in 1996, **modified in 2009, and approved for modification in 2010**, for the application of corrosion resistant coatings to ferrous-based metal fasteners, and consisting of:
 - (1) ---
 - (3) One (1) dacrotizing metal treatment process (DC1), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, **uncontrolled with a thermal oxidizer with a maximum heat input capacity of 1.7 MMBtu/hour**, and exhausting to ~~the inside of the building~~ **stack V9-2**;
 - (4) ---
 - (5) One (1) dacrotizing metal treatment process (DC1), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, **uncontrolled with a thermal oxidizer with a maximum heat input capacity of 1.7 MMBtu/hour**, and exhausting to ~~the inside of the building~~ **stack V9-2**;
- (c) ---

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Units Descriptions

- (a) ---
- (b) Dacrotizing Coating Line 1, identified as DC1, constructed in 1996, **modified in 2009, and approved for modification in 2010**, for the application of corrosion resistant coatings to ferrous-based metal fasteners, and consisting of:
 - (1) ---
 - (3) One (1) dacrotizing metal treatment process (DC1), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, **uncontrolled with a thermal oxidizer with a maximum heat input capacity of 1.7 MMBtu/hour**, and exhausting to ~~the inside of the building~~ **stack V9-2**;
 - (4) ---

- (5) One (1) dactroizing metal treatment process (DC1), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, ~~uncontrolled with a thermal oxidizer~~ **with a maximum heat input capacity of 1.7 MMBtu/hour**, and exhausting to ~~the inside of the building~~ **stack V9-2;**

(c) ---

D.1.6 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water from **each of** emission units EU-22 and EU-38, as delivered to the applicator.
- (b) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water from each of emission units EU-9, and EU-9b, as delivered to the applicator.
- (c) Pursuant to 326 IAC 8-1-2(b), the VOC emissions from the DC1 operation, including units EU-9 and EU-9b shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids. Equivalent VOC emission limit was calculated using the following equation:

$$E = L/(1-L/D)$$

Where:

E = Equivalent emission limit in pounds of VOC per gallon of coating solids, as applied.

L = Applicable emission limit from Article 8 in pounds of VOC per gallon of coating.

D = Baseline solvent density of VOC in the coating, which is equal to 7.36 pounds of VOC per gallon of solvent.

Using the above equation, the pound of VOC per gallon of coating solids shall be limited to less than 6.67 pounds of VOC per gallon of coating solids.

- (d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 38.7%

D.1.7 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

- (a) ---
- (b) ~~The dactotizing metal treatment process, identified as EU-9, shall be limited such that the actual VOC emissions shall not exceed fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-9 will not apply to emission unit EU-9.~~
- (c) ~~The dactotizing metal treatment process, identified as EU-9b, shall be limited such that the actual VOC emissions shall not exceed fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-9 will not apply to emission unit EU-9b.~~

D.1.11 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.6(a), D.1.7 and D.1.8 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.12 VOC Control [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and to comply with Condition D.1.6(b), the Permittee shall operate the thermal oxidizer at all times coating lines EU-9 and EU-9b are in operation.

D.1.13 Testing Requirements [326 IAC 2-8-5(a)(1)(4)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency in Condition D.1.6(b) for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.124 Visible Emissions Notations

D.1.15 Thermal Oxidizer Temperature

- (a) **A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average. From the date of startup until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of at least 1,400 degrees Fahrenheit.**
- (b) **The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.6(b), as approved by IDEM.**
- (c) **On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliance stack test.**

D.1.136 Parametric Monitoring

- (a) ---
- (b) **The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits established in Condition D.1.6.**
- (c) **The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range established in most recent compliant stack test.**

D.1.147 Broken or Failed Bag Detection

D.1.158 Record Keeping Requirements

- (a) To document compliance with conditions D.1.6 and D.1.8, the Permittee shall maintain records in accordance with (1) through (34) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.1.6, and D.1.8.
- (1) ---
- (4) **The monthly cleanup solvent usage.**
- (b) ---
- (c) To document compliance with Condition D.1.124, the Permittee shall maintain a daily record of visible emission notations of the abrasive blasting stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (d) **To document compliance with Condition D.1.15, the Permittee shall maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.**
- (de) To document compliance with Condition D.1.146, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the abrasive blasting process. 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, (e.g., the process did not operate that day).
- (f) **To document compliance with Condition D.1.16, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizer. The Permittee shall include in its daily record when the duct pressure or fan amperage is not taken and the reason for the lack of the reading (e.g. the process did not operate that day).**
- (eg) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.169 Reporting Requirements

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on November 20, 2009.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Minor Revision No. 059-28795-00024. The staff recommends to the Commissioner that this FESOP Minor Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jack Harmon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4228 or toll free at 1-800-451-6027 extension 3-4228.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
Entire Source Emission New Summary**

| | |
|-----------------------------|---|
| Company Name: | Indiana Automotive Fasteners |
| Address City IN Zip: | 1300 West Anderson Boulevard, Greenfield, IN 46140 |
| Permit No.: | F059-21946-00024 |
| Permit Revision No.: | 059-28795-00024 |
| Reviewer: | Jack Harmon |
| Date: | February 15, 2010 |

| Unlimited Potential Emissions (tons/year) | | | | | | | | | | | | | | |
|---|-------------------|---|--------------------------------------|--------------------|---|--|--|--|--|--|--|-----------------|---|-----------------|
| Category | Pollutant | Emissions Generating Activity | | | | | | | | | | | Natural Gas Combustion (multiple units) | TOTAL |
| | | Abrasive Blasting * (EU-8a, EU-8b.) (EU-20a & EU-20b) (EU-37) | Head & Nut Forming Machines † (EU-6) | Rolling Oil (EU-6) | DC1 Line Dip Coating / Dacrotizing (EU-9) | DC1 Line Dip Coating / Dacrotizing (EU-9b) | DS2 Line Dip Coating / Dacrotizing (EU-22) | DS3 Line Dip Coating / Dacrotizing (EU-38) | BZ1 Line Zinc Plating / Chromate Dip (EU-12) | BZ2 Line Zinc Plating / Chromate Dip (EU-27) | BZ3 Line Zinc Plating / Chromate Dip (EU-41) | | | |
| Criteria Pollutants | PM | 48.60 | 63.05 | 0 | 0.31 | 0.19 | 0 | 0 | 0 | 0 | 0 | 0 | 0.14 | 112.29 |
| | PM10 | 17.14 | 63.05 | 0 | 0.31 | 0.19 | 0 | 0 | 0 | 0 | 0 | 0 | 0.57 | 81.26 |
| | PM2.5 | 17.14 | 63.05 | 0 | 0.31 | 0.19 | 0 | 0 | 0 | 0 | 0 | 0 | 0.42 | 81.11 |
| | SO2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.04 | 0.04 |
| | NOx | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7.45 | 7.45 |
| | VOC | 0 | 7.63 | 2.18 | 11.47 | 10.85 | 3.11 | 3.11 | 0.03 | 0.03 | 0 | 0 | 0.41 | 38.81 |
| | CO | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6.26 | 6.26 |
| Hazardous Air Pollutants | Benzene | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.57E-04 | 1.57E-04 |
| | Cumene | 0.00E+00 | 0.00E+00 | 0.00E+00 | 7.97E-05 | 7.97E-05 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.59E-04 |
| | Dichlorobenzene | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 8.95E-05 | 8.95E-05 |
| | Formaldehyde | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 5.59E-03 | 5.59E-03 |
| | Hexane | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.34E-01 | 1.34E-01 |
| | Hydrochloric Acid | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.75E-01 | 1.75E-01 | 7.78E-02 | 7.78E-02 | 0.00E+00 | 4.28E-01 |
| | Methanol | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.79E+00 | 1.79E+00 | 1.49E-02 | 1.49E-02 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 3.61E+00 |
| | Naphthalene | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.35E-01 | 1.35E-01 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.69E-01 |
| | Toluene | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.53E-04 | 2.53E-04 |
| | Xylenes | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.74E-01 | 1.74E-01 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 3.48E-01 |
| | Cadmium * | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 8.20E-05 | 8.20E-05 |
| | Chromium * | 9.38E-02 | 6.96E-02 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 3.93E-01 | 3.93E-01 | 1.97E-02 | 1.04E-04 | 9.70E-01 |
| | Lead * | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 3.73E-05 | 3.73E-05 |
| | Manganese * | 4.88E-01 | 4.21E-01 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.83E-05 | 9.09E-01 |
| | Nickel * | 7.51E-02 | 7.73E-03 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.57E-04 | 8.29E-02 |
| | Totals | 6.57E-01 | 4.99E-01 | 0.00E+00 | 3.09E-01 | 3.09E-01 | 1.79E+00 | 1.79E+00 | 5.84E-01 | 5.84E-01 | 9.75E-02 | 1.41E-01 | Worse Case HAP | 3.61E+00 |

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

* Metal HAPS, including Cadmium, Chromium, Lead, Manganese and Nickel, are particulate in nature and can be controlled using a control device.

† Limited PM Emissions and unlimited, uncontrolled PM10 & PM2.5 emissions

‡ Limited PM, PM10 & PM2.5 emissions

**Appendix A: Emissions Calculations
Revision Summary**

| | |
|-----------------------------|---|
| Company Name: | Indiana Automotive Fasteners |
| Address City IN Zip: | 1300 West Anderson Boulevard, Greenfield, IN 46140 |
| Permit No.: | F059-21946-00024 |
| Permit Revision No.: | 059-28795-00024 |
| Reviewer: | Jack Harmon |
| Date: | February 15, 2010 |

| Unlimited Uncontrolled Potential Emissions (tons/year) | | | | | |
|--|-------------------------|--|-----------------------------------|-----------------------------------|-------------------|
| Category | Pollutant | Emissions Generating Activity (tons per year) | | | |
| | | <u>New Units</u> | <u>EU-9</u> | <u>EU-9b</u> | <u>Rev. Total</u> |
| | | RTO Serving DC1 Lines EU9, EU9b | (Removal of 15#/day VOC limit) | (Removal of 15#/day VOC limit) | |
| Criteria Pollutants | PM | 0.01 | | | 0.01 |
| | PM10 | 0.06 | | | 0.06 |
| | PM2.5 | 0.04 | | | 0.04 |
| | SO2 | 0.00 | | | 0.00 |
| | NOx | 0.74 | | | 0.74 |
| | VOC | 0.04 | 8.74 | 8.11 | 16.89 |
| | CO | 0.63 | | | 0.63 |
| Hazardous Air Pollutants | Benzene | 1.56E-05 | | | 1.56E-05 |
| | Dichlorobenzene | 8.94E-06 | | | 8.94E-06 |
| | Formaldehyde | 5.58E-04 | | | 5.58E-04 |
| | Hexane | 1.34E-02 | | | 1.34E-02 |
| | Toluene | 2.53E-05 | | | 2.53E-05 |
| | Lead | 3.72E-06 | | | 3.72E-06 |
| | Cadmium | 8.19E-06 | | | 8.19E-06 |
| | Chromium | 1.04E-05 | | | 1.04E-05 |
| | Manganese | 2.83E-06 | | | 2.83E-06 |
| | Nickel | 1.56E-05 | | | 1.56E-05 |
| | | Total HAPs | 1.40E-02 | | |
| | Worst Single HAP | Hexane | | | 1.34E-02 |

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

Appendix A: Emissions Calculations
Potential Particulate, VOC and HAP Emissions
All Combustion Units with Revision
MM BTU/HR <100

Company Name: Indiana Automotive Fasteners
 Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140
 Permit No.: F059-21946-00024
 Permit Revision No.: 059-28795-00024
 Reviewer: Jack Harmon
 Date : February 15, 2010

| Existing Units | | | |
|---|----------|---------------|--------------|
| Emission Unit | MMBtu/hr | Emission Unit | MMBtu/hr |
| EU-3 | 0.79 | EU-22 | 0.7 |
| EU-7 | 0.4 | EU-23 | 0.16 |
| EU-9a | 0.7 | EU-25 | 0.95 |
| EU-14 | 0.4 | EU-29 | 0.95 |
| EU-15 | 2.1 | EU-31 | 0.95 |
| EU-15-1 | 2.1 | EU-33 | 0.95 |
| EU-16 | 1.2 | EU-35 | 0.95 |
| EU-21 | 0.3 | EU-34 | 1.72 |
| New RTO | | | 1.7 |
| Combined Total Heat Input Capacity | | | 17.02 |

Combined Total
 Potential Throughput
 MMCF/yr

149.1

| | Criteria Pollutants | | | | | | |
|-------------------------------|---------------------|-------|--------|------|----------------------|------|------|
| | PM* | PM10* | PM2.5* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 5.7 | 0.6 | 100.0 **see below | 5.5 | 84.0 |
| Potential Emission in tons/yr | 0.14 | 0.57 | 0.42 | 0.04 | 7.45 | 0.41 | 6.26 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is condensable PM2.5 only.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

| | HAPs - Organics | | | | |
|--|-----------------|-----------------|--------------|-----------|----------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr (existing units) | 1.57E-04 | 8.95E-05 | 5.59E-03 | 1.342E-01 | 2.53E-04 |

| | HAPs - Metals | | | | |
|--|---------------|-----------|-----------|-----------|-----------|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr (existing units) | 3.727E-05 | 8.200E-05 | 1.044E-04 | 2.833E-05 | 1.565E-04 |

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

Total **0.14** tons/yr

Methodology

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

Notes

MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 All emission factors are based on normal firing.
 Total Potential Emissions based on rated capacity at 8,760 hours/year.
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98).

The insignificant emission units above listed in BOLD are not subject to any specific requirements, but have been added to the calcs/permit purely for documentation purposes, to help clarify existing units from new ones and to avoid confusion during future permitting activities.

**Appendix A: Emissions Calculations
Potential Particulate, VOC and HAP Emissions
Thermal Oxidizer Unit Serving DC1 Lines
MM BTU/HR <100**

Page 4 of 5, Appendix A

Company Name: Indiana Automotive Fasteners
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140
Permit No.: F059-21946-00024
Permit Revision No.: 059-28795-00024
Reviewer: Jack Harmon
Date: February 15, 2010

| Existing Units | | | |
|------------------------------------|----------|---------------|-------------|
| Emission Unit | MMBtu/hr | Emission Unit | MMBtu/hr |
| EU-3 | | EU-22 | |
| EU-7 | | EU-23 | |
| EU-9a | | EU-25 | |
| EU-14 | | EU-29 | |
| EU-15 | | EU-31 | |
| EU-15-1 | | EU-33 | |
| EU-16 | | EU-35 | |
| EU-21 | | EU-34 | |
| New RTO | | | 1.7 |
| Combined Total Heat Input Capacity | | | 1.70 |

Combined Total
Potential Throughput
MMCF/yr

14.9

| | Criteria Pollutants | | | | | | |
|-------------------------------|---------------------|-------|--------|------|----------------------|------|------|
| | PM* | PM10* | PM2.5* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 5.7 | 0.6 | 100.0 **see below | 5.5 | 84.0 |
| Potential Emission in tons/yr | 0.01 | 0.06 | 0.04 | 0.00 | 0.74 | 0.04 | 0.63 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is condensable PM2.5 only.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

| | HAPs - Organics | | | | |
|--|-----------------|-----------------|--------------|-----------|----------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr (existing) | 1.56E-05 | 8.94E-06 | 5.58E-04 | 1.340E-02 | 2.53E-05 |

| | HAPs - Metals | | | | |
|--|---------------|-----------|-----------|-----------|-----------|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr (existing) | 3.723E-06 | 8.191E-06 | 1.042E-05 | 2.829E-06 | 1.564E-05 |

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

| | | |
|------------------|-----------------|---------|
| Total HAPs | 0.014 | tons/yr |
| Worst Single HAP | 0.013 | tons/yr |
| | (Hexane) | |

Methodology

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

Notes

MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
All emission factors are based on normal firing.
Total Potential Emissions based on rated capacity at 8,760 hours/year.
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98).

Appendix A: Emissions Calculations
Entire Source Emission Summary Before Revision

Company Name: Indiana Automotive Fasteners
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140
Permit No.: F059-21946-00024
Permit Revision No.: F059-28502-00024
Reviewer: Hannah L. Desrosiers
Date Received: September 24, 2009

| Category | Pollutant | Unlimited Uncontrolled Potential Emissions (tons/year) | | | | | | | | | | | TOTAL | |
|--------------------------------|-------------------|--|---|--------------------------|--|--|---|---|---|---|---|---|-----------------------|--------------|
| | | Emissions Generating Activity | | | | | | | | | | | | |
| | | Abrasive Blasting (EU-8a, EU-8b, EU-20a & EU-20b) (EU-37) | Head & Nut Forming Machines (EU-6) | Rolling Oil (EU-6) | DC1 Line Dip Coating / Dacrolizing (EU-9) | DC1 Line Dip Coating / Dacrolizing (EU-9) | DS2 Line Dip Coating / Dacrolizing (EU-22) | DS3 Line Dip Coating / Dacrolizing (EU-38) | B21 Line Zinc Plating / Chromate Dip (EU-12) | B22 Line Zinc Plating / Chromate Dip (EU-27) | B23 Line Zinc Plating / Chromate Dip (EU-41) | Natural Gas Combustion (multiple units) | | |
| Criteria Pollutants | PM | 171.36 | 88.25 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.13 | 259.75 |
| | PM10 | 17.14 | 88.25 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.54 | 105.92 |
| | PM2.5 | 17.14 | 88.25 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.40 | 105.79 |
| | SO2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.04 | 0.04 |
| | NOx | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7.09 | 7.09 |
| | VOC | 0 | 7.63 | 2.18 | 11.22 | 10.79 | 3.11 | 3.11 | 0.03 | 0.03 | 0 | 0 | 0.39 | 38.48 |
| Hazardous Air Pollutants | CO | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5.95 | 5.95 |
| | Benzene | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1.49E-04 | 1.49E-04 |
| Hazardous Air Pollutants | Cumene | 0 | 0 | 0 | 3.34E-04 | 3.34E-04 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6.69E-04 |
| | Dichlorobenzene | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 8.50E-05 | 8.50E-05 |
| | Formaldehyde | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5.32E-03 | 5.32E-03 |
| | Hexane | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.13 | 0.13 |
| | Hydrochloric Acid | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3.51 | 3.51 | 1.56 | 0 | 8.57 | |
| | Methanol | 0 | 0 | 0 | 0 | 1.79 | 1.79 | 0.30 | 0.30 | 0.39 | 0.39 | 0 | 4.18 | |
| | Naphthalene | 0 | 0 | 0 | 0.56 | 0.56 | 0 | 0 | 0 | 0 | 0 | 0 | 1.13 | |
| | Toluene | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2.41E-04 | 2.41E-04 |
| | Xylenes | 0 | 0 | 0 | 0.72 | 0.72 | 0 | 0 | 0 | 0 | 0 | 0 | 1.44 | |
| | Cadmium * | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7.80E-05 | 7.80E-05 |
| | Chromium * | 1.88 | 0.70 | 0 | 0 | 0 | 0 | 0 | 0.39 | 0.39 | 0.39 | 0 | 9.92E-05 | 3.75 |
| | Lead * | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3.54E-05 | 3.54E-05 |
| | Manganese * | 9.76 | 4.21 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2.69E-05 | 13.97 |
| | Nickel * | 0.18 | 0.08 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1.49E-04 | 0.26 |
| | Totals | 11.82 | 4.99 | 0 | 1.28 | 1.28 | 1.79 | 1.79 | 4.20 | 4.20 | 1.95 | 0.13 | 33.43 | |
| | | | | | | | | | | | | | Worse Case HAP | 13.97 |

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

Appendix A: Emissions Calculations
Entire Source Emission Summary Before Revision

Company Name: Indiana Automotive Fasteners
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140
Permit No.: F059-21946-00024
Permit Revision No.: F059-28502-00024
Reviewer: Hannah L. Desrosiers
Date Received: September 24, 2009

| Category | Pollutant | Limited and Controlled Potential Emissions (tons/year) | | | | | | | | | | | TOTAL | |
|--------------------------------|-------------------|--|---|--------------------------|--|---|---|---|---|---|---|---|-----------------------|-------------|
| | | Emissions Generating Activity | | | | | | | | | | | | |
| | | Abrasive Blasting * (EU-8a, EU-8b, EU-20a & EU-20b) (EU-37) | Head & Nut Forming Machines * (EU-6) | Rolling Oil (EU-6) | DC1 Line Dip Coating / Dacrolizing * (EU-9) | DC1 Line Dip Coating / Dacrolizing * (EU-9b) | DS2 Line Dip Coating / Dacrolizing (EU-22) | DS3 Line Dip Coating / Dacrolizing (EU-38) | B21 Line Zinc Plating / Chromate Dip (EU-12) | B22 Line Zinc Plating / Chromate Dip (EU-27) | B23 Line Zinc Plating / Chromate Dip (EU-41) | Natural Gas Combustion (multiple units) | | |
| Criteria Pollutants | PM | 48.60 | 63.05 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.13 | 111.79 |
| | PM10 | 17.14 | 63.05 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.54 | 80.73 |
| | PM2.5 | 17.14 | 63.05 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.40 | 80.59 |
| | SO2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.04 | 0.04 |
| | NOx | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7.09 | 7.09 |
| | VOC | 0 | 7.63 | 2.18 | 2.73 | 2.73 | 3.11 | 3.11 | 0.03 | 0.03 | 0 | 0 | 0.39 | 21.94 |
| Hazardous Air Pollutants | CO | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5.95 | 5.95 |
| | Benzene | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1.49E-04 | 1.49E-04 |
| Hazardous Air Pollutants | Cumene | 0 | 0 | 0 | 7.97E-05 | 7.97E-05 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1.59E-04 |
| | Dichlorobenzene | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 8.50E-05 | 8.50E-05 |
| | Formaldehyde | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5.32E-03 | 5.32E-03 |
| | Hexane | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.13 | 0.13 |
| | Hydrochloric Acid | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.18 | 0.18 | 0.08 | 0 | 0.43 | |
| | Methanol | 0 | 0 | 0 | 0 | 0 | 1.79 | 1.79 | 0.01 | 0.01 | 0 | 0 | 3.61 | |
| | Naphthalene | 0 | 0 | 0 | 0.13 | 0.13 | 0 | 0 | 0 | 0 | 0 | 0 | 0.27 | |
| | Toluene | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2.41E-04 | 2.41E-04 |
| | Xylenes | 0 | 0 | 0 | 0.17 | 0.17 | 0 | 0 | 0 | 0 | 0 | 0 | 0.35 | |
| | Cadmium * | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7.80E-05 | 7.80E-05 |
| | Chromium * | 0.09 | 0.07 | 0 | 0 | 0 | 0 | 0 | 0.39 | 0.39 | 0.02 | 0 | 9.92E-05 | 0.97 |
| | Lead * | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3.54E-05 | 3.54E-05 |
| | Manganese * | 0.49 | 0.42 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2.69E-05 | 0.91 |
| | Nickel * | 0.08 | 0.01 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1.49E-04 | 0.08 |
| | Totals | 0.66 | 0.50 | 0 | 0.31 | 0.31 | 1.79 | 1.79 | 0.58 | 0.58 | 0.10 | 0.13 | 6.75 | |
| | | | | | | | | | | | | | Worse Case HAP | 3.61 |

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

* Metal HAPs, including Cadmium, Chromium, Lead, Manganese and Nickel, are particulate in nature and can be controlled using a control device.

• Limited PM Emissions and unlimited, uncontrolled PM10 & PM2.5 emissions

• Limited PM, PM10 & PM2.5 emissions

• Limited VOC emissions

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

Company Name: Indiana Automotive Fasteners
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140
Permit No.: F059-21946-00024
Permit Revision No.: 059-28795-00024
Reviewer: Jack Harmon
Date: February 15, 2010

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|-------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| Magni B06J* | 12.39 | 42.90% | 0.0% | 42.9% | 0.0% | 64.70% | 0.000088 | 5600.0 | 5.32 | 5.32 | 2.62 | 62.87 | 11.47 | 0.31 | 8.22 | 98% |
| Magni B18* | 9.34 | 53.80% | 0.0% | 53.8% | 0.0% | 37.10% | 0.000088 | 5600.0 | 5.02 | 5.02 | 2.48 | 59.43 | 10.85 | 0.19 | 13.54 | 98% |

Weighted Avg.
10.88
lb VOC/gal
solids

State Potential Emissions **Add worst case coating to all solvents**

METHODOLOGY

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

surcoat.xls 9/95

* Calculations above already include the dilution and are represented as "As Applied", according to the source.

Magni B806J Coating is mixed with agent SC-150 in the following ratios, for "As Applied":

Magni 806J - 80 gallons
SC-150 - 5 gallons

Magni B18 Coating is mixed with agent MPA in the following ratios, for "As Applied":

Magni B18 - 80 gallons
MPA - 10 gallons



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Gary Berling
Surface Treatment & Env. Eng. Specialist
Indiana Automotive Fasteners, Inc.
1300 W. Anderson Blvd
Greenfield IN 46140

DATE: March 9, 2010

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

SUBJECT: Final Decision
Minor Permit Modification
059-28795-00024

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Nisha Sizemore August Mack Environmental, Inc.
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

| | | | | |
|----------------------------|---|---|---|--|
| IDEM Staff | BMILLER 3/9/2010 Indiana Automotive Fasteners, Inc. 059-28795-00024 (final) | | | 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 | Type of Mail: CERTIFICATE OF MAILING ONLY | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handling 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 | | Gary Berling Surface Treatment & Environmental Eng Specialist Indiana Automotive Fasteners, Inc. 1300 W Anderson Blvd Greenfield IN 46140 (Source CAATS) Via Confirmed Delivery | | | | | | | | | |
| 2 | | Hancock County Commissioners 111 American Legion #219 Greenfield IN 46140 (Local Official) | | | | | | | | | |
| 3 | | Hancock County Health Department 111 America Legion Greenfield IN 46140-2365 (Health Department) | | | | | | | | | |
| 4 | | Greenfield City Council and Mayors Office 10 S. State St. Greenfield IN 46140 (Local Official) | | | | | | | | | |
| 5 | | Nisha Sizemore August Mack Environmental, Inc. 1200 N. Meridian Street Ste #400 Indianapolis IN 46204 (Consultant) | | | | | | | | | |
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|---|--|--|--|
| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
|---|--|--|--|