



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 27, 2011

RE: Benteler Automotive Corp. / 039 - 30715 - 00619

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

## Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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

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

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

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

Enclosures  
FNPER-AM.dot12/3/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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William Harner  
Benteler Automotive Corporation  
910 South Eisenhower Drive  
Goshen, IN 46526

July 27, 2011

Re: 039-30715-00619  
Second Administrative Amendment to  
F039-29167-00619

Dear Mr. Harner:

Benteler Automotive Corporation was issued a New Source Construction and Federally Enforceable State Operating Permit (FESOP) No. F039-29167-00619 on July 16, 2010 for a stationary steel automotive component manufacturing plant located at 910 South Eisenhower Drive, Goshen, IN 46526. On July 18, 2011, the Office of Air Quality (OAQ) received an application from the source relating to the addition of two identical natural gas-fired thermal forming ovens to process aluminum coated steel to enhance the strength and durability properties. This addition of treatment ovens to the permit is considered an administrative amendment pursuant to 326 IAC 2-8-10(a)(14), and will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3 (see Appendix A Page 4 for the PTE calculations for the natural gas-fired thermal forming furnaces). The entire source will continue to limit PM10 and PM2.5 emissions to less than 100 tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-7 not applicable (see Appendix A and table below). This modification will be processed as an administrative amendment pursuant to 326 IAC 2-8-10(a).

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	**GHGs CO <sub>2</sub> e	Total HAPs	Single HAP (Manganese)
Shot Blast 1	75.69	20.02	20.02	-	-	-	-	-	1.32	0.98
Shot Blast 2	60.27	20.02	20.02	-	-	-	-	-	1.05	0.78
Shot Blast 3	60.27	20.02	20.02	-	-	-	-	-	1.05	0.78
Natural Gas Combustion	0.19	0.74	0.74	0.06	9.74	0.54	8.18	11,762.0	0.18	Negl.
<b>Two (2) Thermal Forming Ovens</b>	<b>0.06</b>	<b>0.23</b>	<b>0.23</b>	<b>0.02</b>	<b>3.08</b>	<b>0.17</b>	<b>2.59</b>	<b>3,716.4</b>	<b>0.055</b>	<b>Negl.</b>
<b>Total PTE of Entire Source</b>	<b>196.47***</b>	<b>61.02</b>	<b>61.02</b>	<b>0.08</b>	<b>12.82</b>	<b>0.71</b>	<b>10.77</b>	<b>15,478.47 ***</b>	<b>3.63</b>	<b>2.54</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible

\* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

\*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

\*\*\* Unlimited PTE

Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**:

- (1) The description of the new thermal forming ovens in Section A.3 has been revised as follows:
  - (c) Natural gas-fired combustion sources with heat input less than or equal to or less than ten million (10,000,000) Btu per hour, including:
    - (1) One (1) natural gas-fired Can-Eng thermal forming oven rated at 2.82 MMBtu per hour.
    - ...
    - (7) **Two (2) natural gas-fired thermal forming ovens, approved for construction in 2011, rated at 3.514 MMBtu per hour each, maximum metal process weight rate of 2.34 tons/hr, exhausting outside.**

NOTE: There are no particulate emissions from the thermal treatment of the metal parts. The emissions are from the natural gas combustion only.

- (2) The Condition C.2 is revised as follows to address new GHGs 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.

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

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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) **and greenhouse gases (GHGs)**, from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - ...
  - (4) **The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.**

**State Rule applicability:**

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired thermal forming ovens are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired thermal forming ovens are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because they each have the potential to emit particulate matter less than 0.551 pounds per hour each.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)

The natural gas-fired thermal forming ovens are not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions of sulfur dioxide are less than twenty-five (25) tons per year and ten (10) pounds per hour each.

326 IAC 4-2-2 (Incinerators)

The natural gas-fired thermal forming ovens are not subject to the requirements of 326 IAC 4-2-1 because they do not meet the definition of an incinerator provided in 326 IAC 1-2-34 and are not subject to any of the rules identified in 326 IAC 4-2-1(b)(2).

326 IAC 9-1-2 (Carbon monoxide emission limits)

The natural gas-fired thermal forming ovens are not subject to this the requirements of 326 IAC 9-1-2, because these are not refuse burning equipment or refuse incinerators.

326 IAC 2-7

The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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](http://www.idem.in.gov)

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 Swarna Prabha, of my staff, at 317-234-5376 or 1-800-451-6027, and ask for extension 4-5376.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/sp

Attachments: Updated Permit and Appendix A

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



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## New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Benteler Automotive Corporation  
910 South Eisenhower Drive  
Goshen, Indiana 46526**

(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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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.: F039-29167-00619	
Issued by: <i>original signed by</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 16, 2010 Expiration Date: July 16, 2015

First Administrative Amendment No. 039-30407-00619, issued May 12, 2011

Second Administrative Amendment No. 039-30715-00619	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 27, 2011 Expiration Date: July 16, 2015

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary steel automotive component manufacturing plant.

Source Address:	910 South Eisenhower Drive, Goshen, Indiana 46526
General Source Phone Number:	(574) 537-2930
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) Schlick shotblaster identified as Shot Blast 1, blasting steel and carbon with maximum throwing capacity of 2.16 tons per hour of blasting media, and a maximum throughput capacity of 21.6 tons per hour, equipped with a Wheelabrator baghouse for particulate control, and exhausting through one (1) stack identified as S01.
- (b) One (1) Rosler shot blast system, identified as Shot Blast 2, constructed in 2009, having a maximum throwing capacity of 1.72 tons per hour of Ervin Industries SG-50 blasting grit, and a maximum throughput capacity of 103 tons per hour, equipped with a Scientific Dust Collector system, and exhausting either within the building, or vented externally through one (1) stack identified as S02.
- (c) One (1) Rosler shot blast system, identified as Shot Blast 3, constructed in 2009, approved for modification in 2011, having a maximum throwing capacity of 1.72 tons per hour of Ervin Industries SG-50 blasting grit, and a maximum throughput capacity of 103 tons per hour, equipped with a Scientific Dust Collector system, and exhausting either within the building, or vented externally through one (1) stack identified as S02.

Note: The Scientific Dust Collector system is a common control for both Shot Blasts 2 and 3.

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

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- (a) One (1) laser and cutting operation consisting of three (3) prima laser cutters, equipped with a Torit dust collector for particulate control, and exhausting inside the building.
- (b) Thirty-seven (37) Spot Weld Guns, utilizing no control devices, exhausting within the building, consisting of the following:
  - (1) Two (2) spot weld guns, associated with the PS-24 Line
  - (2) Two (2) spot weld guns, associated with the Toyota Line

- (3) Three (3) spot weld guns, associated with the BMW Line
  - (4) Four (4) spot weld guns, associated with the Lamda Line
  - (5) Two (2) spot weld guns, associated with the Nissan Nut Welder Line
  - (6) Two (2) spot weld guns, associated with the KK Line
  - (7) Fourteen (14) spot weld guns, associated with the RT Line
  - (8) Two (2) spot weld guns, associated with the Nissan Line
  - (9) Six (6) spot weld guns, associated with the DS line
- (c) Natural gas-fired combustion sources with heat input less than or equal to or less than ten million (10,000,000) Btu per hour, including:
- (1) One (1) natural gas-fired Can-Eng thermal forming oven rated at 2.82 MMBtu per hour.
  - (2) Three (3) natural gas-fired Schwartz thermal forming ovens rated at 3.326, 3.701, and 4.541 MMBtu per hour.
  - (3) One (1) natural gas-fired Rekumat thermal forming oven rated at 3.9 MMBtu per hour, approved for construction in 2007.
  - (4) One (1) natural gas-fired Elino thermal forming oven, installed in 2007, rated at 3.141 MMBtu/hr.
  - (5) Three (3) natural gas-fired HVAC air make up units, installed in 2006, each rated at 8.47 MMBtu/hr, exhausting through individual stacks.
  - (6) Four (4) natural gas-fired office heaters rated at 0.224, 0.08, 0.40 and 0.10 MMBtu per hour.
  - (7) Two (2) natural gas-fired thermal forming ovens, approved for construction in 2011, rated at 3.514 MMBtu per hour each, maximum metal process weight rate of 2.34 tons/hr, exhausting outside.
- (d) The following VOC and HAP storage containers:
- (1) Vessels storing lubricating oils, machining oils, and machining fluids.
- (e) Cleaners and solvents characterized as follows:
- (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100° F);
- (f) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs, including:
- (1) Three (3) electrically heated, water-based parts washers, installed in 2007, each with a capacity of 850 gallons.

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

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

## **SECTION B GENERAL CONDITIONS**

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

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

### **B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

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- (a) This permit, F039-29167-00619, 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.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

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

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

**B.7 Severability [326 IAC 2-8-4(4)]**

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

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

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

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(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

(ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent 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.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 April 15 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.14 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, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.
  - (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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F039-29167-00619 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.16 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.17 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.18 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 a

certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.20 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.21 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.22 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]**

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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.23 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  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), 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.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

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

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

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

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

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

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

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

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

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

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

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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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]**

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

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

---

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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]**

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

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

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

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

no later than 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to 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 excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning 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 normal or usual manner of operation.

- (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 record the reasonable response steps 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

**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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, 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**

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

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) One (1) Schlick shot blast system identified as Shot Blast 1, blasting steel and carbon with a maximum throwing capacity of 2.16 tons per hour of blasting media, and a maximum throughput capacity of 21.6 tons per hour, equipped with a Wheelabrator baghouse for particulate control, and exhausting through one (1) stack identified as S01.
- (b) One (1) Rosler shot blast system, identified as Shot Blast 2, constructed in 2009, having a maximum throwing capacity of 1.72 tons per hour of Ervin Industries SG-50 blasting grit, and a maximum throughput capacity of 103 tons per hour, equipped with a Scientific Dust Collector system, and exhausting either within the building, or vented externally through one (1) stack identified as S02.
- (c) One (1) Rosler shot blast system, identified as Shot Blast 3, constructed in 2009, approved for modification in 2011, having a maximum throwing capacity of 1.72 tons per hour of Ervin Industries SG-50 blasting grit, and a maximum throughput capacity of 103 tons per hour, equipped with a Scientific Dust Collector system, and exhausting either within the building, or vented externally through one (1) stack identified as S02.

Note: The Scientific Dust Collector system is a common control for both Shot Blasts 2 and 3.

(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 FESOP Limitations [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 and PM2.5 emissions from the following units shall not exceed the emission limits listed in the table below:

Control Device Description	Unit Description	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
Wheelabrator Baghouse	Shot Blast 1	4.57	4.57
Scientific Dust Collector System	Shot Blast 2	4.57	4.57
	Shot Blast 3	4.57	4.57

Compliance with these PM10 and PM2.5 limits in conjunction with the PM10 and PM2.5 PTE emissions from all other emissions units shall limit the PM10 and PM2.5 emissions from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) are not applicable.

**D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limit listed in the table below:

Control Device Description	Unit Description	Max. Shot Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Wheelabrator Baghouse	Shot Blast 1	2.16	6.87
Scientific Dust Collector System	Shot Blast 2	1.72	5.90
	Shot Blast 3	1.72	5.90

The pounds per hour limitations were calculated using the following equations:

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

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

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

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.1.4 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, each of the following emission units shall be controlled by the associated control device, as listed in the table below, when these units are in operation:

Control Device Description	Unit ID
Wheelabrator Baghouse	Shot Blast 1
Scientific Dust Collector System	Shot Blast 2
	Shot Blast 3

- (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.

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

#### D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouse stack exhausts (stacks S01 and S02) shall be performed once per day during normal daylight operations, when Shot Blast 1, Shot Blast 2 and Shot Blast 3 are exhausting to the atmosphere. A trained employee or a trained contractor 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 or contractor is a person who has worked or trained 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. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### D.1.6 Parametric Monitoring

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- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with Shot Blast 1, Shot Blast 2 and Shot Blast 3 at least once per day when these units are in operation. When for any one reading, the pressure drop across each baghouse is outside the normal range of 3.0 to 6.0 inches of water, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months.

#### D.1.7 Broken or Failed Bag Detection

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- (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 Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.8 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the baghouse stack exhausts, when exhausting to the atmosphere. 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 (i.e., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a daily record of the pressure drops across each baghouse controlling the processes. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (i.e., the process did not operate that day).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the recordkeeping requirements of this requirement.

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

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

Source Name: Benteler Automotive Corporation  
Source Address: 910 South Eisenhower Drive, Goshen, Indiana 46526  
FESOP Permit No.: F039-29167-00619

**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: Benteler Automotive Corporation  
Source Address: 910 South Eisenhower Drive, Goshen, Indiana 46526  
FESOP Permit No.: F039-29167-00619

**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"><li>• 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</li><li>• 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</li></ul> |
|--|

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

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

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

**Page 2 of 2**

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

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

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

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

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

**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: Benteler Automotive Corporation  
Source Address: 910 South Eisenhower Drive, Goshen, Indiana 46526  
FESOP Permit No.: F039-29167-00619

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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 <b>∆No deviations occurred this reporting period@</b>.</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><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

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

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

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

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

Mail to: Permit Administration and Support Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Benteler Automotive Corporation  
910 South Eisenhower Drive  
Goshen, Indiana 46526

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make  
these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Benteler Automotive Corporation 910 South Eisenhower Drive, Goshen, Indiana 46526, completed construction of the steel automotive component manufacturing plant. on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on April 14, 2010 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F039-29167-00619, Plant ID No. 039-00619 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

**SUMMARY OF EMISSIONS**

**Company Name:** Benteler Automotive Corp.  
**Address City IN Zip:** 910 S. Eisenhower Drive, Goshen, Indiana 46526  
**Permit No.:** 039-29167-00619  
**Administrative Amendment No.:** 039-30715-00619  
**Reviewer:** Swarna Prabha

Uncontrolled Emissions (Tons/Yr)						
Pollutant	Shot Blast 1	Shot Blast 2	Shot Blast 3	Nat. Gas Combustion	Two (2) Thermal forming ovens	Total
PM	75.69	60.27	60.27	0.19	0.06	196.47
PM10	65.09	51.83	51.83	0.74	0.23	169.73
PM2.5	65.09	51.83	51.83	0.74	0.23	169.73
VOC	-	-	-	0.54	0.17	0.71
NOx	-	-	-	9.74	3.08	12.82
SO2	-	-	-	0.06	0.02	0.08
CO	-	-	-	8.18	2.59	10.77
GHGs CO2e	-	-	-	11,762.07	3,716.40	15,478.47
Single HAP (Manganese)	0.98	0.78	0.78	0.00	0.00	2.55
Combined HAPs	1.32	1.05	1.05	0.18	0.03	3.63

Controlled Emissions (Tons/Yr)						
Pollutant	Shot Blast 1	Shot Blast 2	Shot Blast 3	Nat. Gas Combustion	Two (2) Thermal forming ovens	Total
PM	0.38	0.60	0.60	0.19	0.06	1.83
PM10	0.33	0.52	0.52	0.74	0.23	2.34
PM2.5	0.33	0.52	0.52	0.74	0.23	2.34
VOC	-	-	-	0.54	0.17	0.71
NOx	-	-	-	9.74	3.08	12.82
SO2	-	-	-	0.06	0.02	0.08
CO	-	-	-	8.18	2.59	10.77
GHGs CO2e	-	-	-	11,762.07	3,716.40	15,478.47
Single HAP (Manganese)	0.00	0.01	0.01	0.00	0.00	0.02
Combined HAPs	0.007	0.01	0.01	0.18	0.03	0.23

Limited Emissions (Tons/Yr)						
Pollutant	Shot Blast 1	Shot Blast 2	Shot Blast 3	Nat. Gas Combustion	Two (2) Thermal forming ovens	Total
PM	75.69	60.27	60.27	0.19	0.06	196.47
PM10	20.02	20.02	20.02	0.74	0.23	61.02
PM2.5	20.02	20.02	20.02	0.74	0.23	61.02
VOC	-	-	-	0.54	0.17	0.71
Nox	-	-	-	9.74	3.08	12.82
SO2	-	-	-	0.06	0.02	0.08
CO	-	-	-	8.18	2.59	10.77
GHGs CO2e	-	-	-	11,762.07	3,716.40	15,478.47
Single HAP (Manganese)	0.98	0.78	0.78	0.00	0.00	2.54
Combined HAPs	1.32	1.05	1.05	0.18	0.03	3.63

**Appendix A: Emission Calculations  
Schlick Shot Blast System (Shot Blast 1)**

**Company Name:** Benteler Automotive Corp.  
**Address City IN Zip:** 910 S. Eisenhower Drive, Goshen, Indiana 46526  
**Permit No.:** 039-29167-00619  
**Administrative Amendment No.:** 039-30715-00619  
**Reviewer:** Swarna Prabha

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Potential to Emit Before Control						
FR = Flow rate of actual abrasive (lb/hr) =	540.0	lb/hr (per nozzle)				
w = fraction of time of wet blasting =	0	%				
N = number of nozzles =	8					
EF = PM emission factor for actual abrasive from Table 1 =	0.004	lb PM/ lb abrasive				
PM10 emission factor ratio for actual abrasive from Table 1 =	0.86	lb PM10 / lb PM				
<b>Potential to Emit (before control) =</b>	<b>17.3</b>	<b>14.9</b>	<b>0.22</b>	<b>0.04</b>	<b>0.03</b>	<b>lb/hr</b>
=	<b>414.7</b>	<b>356.7</b>	<b>5.39</b>	<b>1.04</b>	<b>0.83</b>	<b>lb/day</b>
=	<b>75.7</b>	<b>65.1</b>	<b>0.98</b>	<b>0.19</b>	<b>0.15</b>	<b>ton/yr</b>
Potential to Emit After Control						
<b>Emission Control Device Efficiency =</b>	<b>99.50%</b>	<b>99.50%</b>	<b>99.50%</b>	<b>99.50%</b>	<b>99.50%</b>	
<b>Potential to Emit (after control) =</b>	<b>0.09</b>	<b>0.07</b>	<b>1.12E-03</b>	<b>2.16E-04</b>	<b>1.73E-04</b>	<b>lb/hr</b>
=	<b>2.07</b>	<b>1.78</b>	<b>2.70E-02</b>	<b>5.18E-03</b>	<b>4.15E-03</b>	<b>lb/day</b>
=	<b>0.38</b>	<b>0.33</b>	<b>4.92E-03</b>	<b>9.46E-04</b>	<b>7.57E-04</b>	<b>ton/yr</b>

**Note:**

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)  
HAP emissions based on MSDS concentrations provided by source.

Assume PM10 = PM2.5

**Methodology:**

Potential to Emit PM/PM10 (before control) = EF x FR x (1 - w/200) x N  
Potential to Emit HAP (before control) = Potential to Emit PM (before control) \* HAP % Weight  
Potential to Emit (after control) = [Potential to Emit (before control)] \* [1 - control efficiency]  
Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

**Appendix A: Emission Calculations**  
**Rosler Shot Blast System (Shot Blast 2 and Shot Blast 3)**

**Company Name:** Benteler Automotive Corp.  
**Address City IN Zip:** 910 S. Eisenhower Drive, Goshen, Indiana 46526  
**Permit No.:** 039-29167-00619  
**Administrative Amendment No.:** 039-30715-00619  
**Reviewer:** Swarna Prabha

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Potential to Emit Before Control for each Shot Blast 2 and Shot Blast 3						
FR = Flow rate of actual abrasive (lb/hr) =	430.0	lb/hr (per nozzle)				
w = fraction of time of wet blasting =	0	%				
N = number of nozzles =	8					
EF = PM emission factor for actual abrasive from Table 1 =	0.004	lb PM/ lb abrasive				
PM10 emission factor ratio for actual abrasive from Table 1 =	0.86	lb PM10 / lb PM				
	<b>PM</b>	<b>PM10</b>	<b>Manganese</b>	<b>Chromuim</b>	<b>Nickel</b>	
<b>Potential to Emit (before control) =</b>	<b>13.8</b>	<b>11.8</b>	<b>0.18</b>	<b>0.03</b>	<b>0.03</b>	<b>lb/hr</b>
=	<b>330.2</b>	<b>284.0</b>	<b>4.29</b>	<b>0.83</b>	<b>0.66</b>	<b>lb/day</b>
=	<b>60.3</b>	<b>51.8</b>	<b>0.78</b>	<b>0.15</b>	<b>0.12</b>	<b>ton/yr</b>
Total Potential to Emit After Control for Shot Blast 2 and Shot Blast 3						
	<b>PM</b>	<b>PM10</b>	<b>Manganese</b>	<b>Chromuim</b>	<b>Nickel</b>	
<b>Emission Control Device Efficiency =</b>	<b>99.50%</b>	<b>99.50%</b>	<b>99.50%</b>	<b>99.50%</b>	<b>99.50%</b>	
<b>Potential to Emit (after control) =</b>	<b>0.14</b>	<b>0.12</b>	<b>1.79E-03</b>	<b>3.44E-04</b>	<b>2.75E-04</b>	<b>lb/hr</b>
=	<b>3.30</b>	<b>2.84</b>	<b>4.29E-02</b>	<b>8.26E-03</b>	<b>6.60E-03</b>	<b>lb/day</b>
=	<b>0.60</b>	<b>0.52</b>	<b>7.83E-03</b>	<b>1.51E-03</b>	<b>1.21E-03</b>	<b>ton/yr</b>

**Note:**  
Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)  
HAP emissions based on MSDS concentrations provided by source.  
Assume PM10 = PM2.5

**Methodology:**  
Potential to Emit PM/PM10 (before control) = EF x FR x (1 - w/200) x N  
Potential to Emit HAP (before control) = Potential to Emit PM (before control) \* HAP % Weight  
Potential to Emit (after control) = [Potential to Emit (before control)] \* [1 - control efficiency]  
Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

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

**Company Name:** Benteler Automotive Corp.  
**Address City IN Zip:** 910 S. Eisenhower Drive, Goshen, Indiana 46526  
**Permit No.:** 039-29167-00619  
**Administrative Amendment No.:** 039-30715-00619  
**Reviewer:** Swarna Prabha

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Unit ID
0.22	1.96	Office Heater 1
0.08	0.70	Office Heater 2
0.40	3.50	Office Heater 3
0.10	0.88	Office Heater 4
2.82	24.70	Can-Eng Thermal Forming Oven
3.33	29.14	Schwartz Thermal Forming Oven 1
3.70	32.42	Schwartz Thermal Forming Oven 2
4.54	39.78	Schwartz Thermal Forming Oven 3
3.91	34.25	Rekumat Thermal Forming Oven
3.14	27.52	Eliino Thermal Forming Oven
<b>22.24</b>	<b>194.85</b>	
<b>7.028</b>	<b>61.57</b>	<b>Two (2) thermal forming ovens</b>

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr (existing)	0.185	0.74	0.06	9.74	0.54	8.18
<b>PTE -Two (2) Heat Treat ovens (tons/yr)</b>	<b>0.058</b>	<b>0.23</b>	<b>0.02</b>	<b>3.08</b>	<b>0.17</b>	<b>2.59</b>
<b>Total</b>	<b>0.24</b>	<b>0.97</b>	<b>0.08</b>	<b>12.82</b>	<b>0.71</b>	<b>10.77</b>

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 3 for HAPs emissions calculations.

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

**Company Name:** Benteler Automotive Corp.  
**Address City IN Zip:** 910 S. Eisenhower Drive, Goshen, Indiana 46526  
**Permit No.:** 039-29167-00619  
**Administrative Amendment No.:** 039-30715-00619  
**Reviewer:** Swarna Prabha

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr (existing)	2.046E-04	1.169E-04	7.307E-03	1.754E-01	3.312E-04
<b>PTE -Two (2) Heat Treat ovens (tons/yr)</b>	<b>6.464E-05</b>	<b>3.694E-05</b>	<b>2.309E-03</b>	<b>5.541E-02</b>	<b>1.047E-04</b>

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.871E-05	1.072E-04	1.364E-04	3.702E-05	2.046E-04
<b>Two (2) Heat Treat ovens (tons/yr)</b>	<b>1.539E-05</b>	<b>3.386E-05</b>	<b>2.453E-06</b>	<b>1.170E-05</b>	<b>6.464E-05</b>

Methodology is the same as page 2.

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

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

**Company Name:** Benteler Automotive Corp.  
**Address City IN Zip:** 910 S. Eisenhower Drive, Goshen, Indiana 46526  
**Permit No.:** 039-29167-00619  
**Administrative Amendment No.:** 039-30715-00619  
**Reviewer:** Swarna Prabha

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Unit ID
0.22	1.96	Office Heater 1
0.08	0.70	Office Heater 2
0.40	3.50	Office Heater 3
0.10	0.88	Office Heater 4
2.82	24.70	Can-Eng Thermal Forming Oven
3.33	29.14	Schwartz Thermal Forming Oven 1
3.70	32.42	Schwartz Thermal Forming Oven 2
4.54	39.78	Schwartz Thermal Forming Oven 3
3.91	34.25	Rekumat Thermal Forming Oven
3.14	27.52	Elino Thermal Forming Oven
22.24	194.85	Total Existing
<b>7.028</b>	<b>61.57</b>	Two (2) Thermal Forming Ovens

**Greenhouse Gas Emissions**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120000	2.3	2.2
Existing furnaces -PTE in tons/yr	11690.92	0.224	0.214
Two Thermal Forming ovens -PTE in tons/yr	3693.917	0.071	0.068
Summed Existing Furnaces Potential Emissions in tons/yr	11,691.36		
Summed Two Thermal Forming ovens -Potential Emissions in tons/yr	3,694.06		
Existing Furnaces -CO2e in tons/yr	11,762.07		
Two (2) Thermal Forming ovens -CO2e in tons/yr	3,716.40		
<b>Total CO2e in tons/yr</b>	<b>15,478.47</b>		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.  
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
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(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

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

TO: William Harner  
Benteler Automotive Corp.  
910 S Eisenhower Dr  
Goshen, IN 46526

DATE: July 27, 2011

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

SUBJECT: Final Decision  
FESOP - Administrative Amendment  
039 - 30715 - 00619

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:  
Raul Guzman, Plant Mgr  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

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2		Raul Guzman Plant Mgr Benteler Automotive Corp 910 S Eisenhower Dr Goshen IN 46526 (RO CAATS)										
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
4		Goshen City Council and Mayors Office 202 South 5th Street Suite 1 Goshen IN 46528 (Local Official)										
5		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
7		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
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