



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 5, 2011

RE: New Point Products, Inc. / 031-30732-00025

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

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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 of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FN-REGIS.dot 1/2/08



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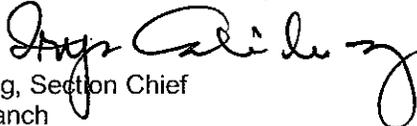
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REGISTRATION OFFICE OF AIR QUALITY

New Point Products Inc.
8563 Highway 46
New Point, Indiana 47263

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 031-30732-00025	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 5, 2011

SECTION A

SOURCE SUMMARY

This registration 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary nonferrous foundry, die casting, spin casting and slush casting of primarily zinc-aluminum alloy.

Source Address:	8563 Highway 46, New Point, IN 47263
General Source Phone Number:	(812) 663-6311
SIC Code:	3364 (Nonferrous Die-Castings, Except Aluminum) 3369 (Nonferrous Foundries, Except Aluminum and Copper)
County Location:	Decatur County Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) paint booth, identified as PB1, constructed in 2002, using dipping and one (1) low pressure air atomization spray gun, with a maximum capacity of 15 metal parts per hour, using dry filters for particulate control, and exhausting inside the building.
- (b) One (1) enclosed pneumatic blasting unit, constructed in 2002, using sand as a media, with a maximum capacity of 10 pounds of steel per hour, using no controls, and exhausting inside.
- (c) Three (3) wood-fired stoves, using clean wood only, with a heat input capacity of 0.06 MMBtu/hr each, using no controls and exhausting outside.

Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).
- (d) One (1) electrically heated wastewater evaporator for evaporating a non-organic solvent (water and a non-VOC and non-HAP solvent) for cleaning of small parts.
- (e) One (1) propane fired melt furnace, identified as F1, constructed in 2002, used for slush casting with a maximum capacity of 25.00 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F1.
- (f) One (1) propane fired melt furnace, identified as F2, constructed in 2002, used for spin casting with a maximum capacity of 7.50 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F2.
- (g) One (1) propane fired melt furnace, identified as F3, constructed in 2002, used for spin casting with a maximum capacity of 2.00 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F3.

- (h) One (1) propane fired melt furnace, identified as F4, constructed in 2002, used for die casting with a maximum capacity of 10.00 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F4.
- (i) One (1) die casting machine, identified as FD4, constructed in 2002, with a maximum capacity of 3.5 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack FD4.
- (j) One (1) propane fired melt furnace, identified as F5, constructed in 2002, used for die casting with a maximum capacity of 10 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F5.
- (k) One (1) propane fired melt furnace, identified as F6, constructed in 2002, used for spin casting with a maximum capacity of 2.00 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F6.
- (l) One (1) copper and brass electroplating tanks, identified as Tank1 and Tank2, constructed in 2002, with a maximum capacity of one (1) pound of copper or brass per hour, each, using no control equipment, and exhausting inside.
- (m) Welding operation used for non-production mold maintenance consisting of:
 - (1) One (1) TIG welder.
 - (2) One (1) MIG welder.
 - (3) One Arc welder.
- (n) Woodworking operation used for non-production mold making and maintenance, consisting of:
 - (1) Three (3) belt sanders.
 - (2) One (1) 12 inch band saw.
 - (3) One (1) enclosed CNC mill.
 - (4) One (1) enclosed CNC lathe.
 - (5) One (1) 12 inch disk sander.
 - (6) One (1) 10 inch table saw.
 - (7) One (1) 6 1/8 joiner.
 - (8) One (1) miter saw.
 - (9) One (1) 12.5 inch SHP planar.
 - (10) One (1) bench drill press.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration 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 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. 031-30732-00025 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 registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

- (c) The notification 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.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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 Registrant 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 Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

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

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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.3 General Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)]

- (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 Registrant, the Registrant 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 Registrant 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.

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) paint booth, identified as PB1, constructed in 2002, using dipping and one (1) low pressure air atomization spray gun, with a maximum capacity of 15 metal parts per hour, using dry filters for particulate control, and exhausting inside the building.
- (b) One (1) enclosed pneumatic blasting unit, constructed in 2002, using sand as a media, with a maximum capacity of 10 pounds of steel per hour, using no controls, and exhausting inside.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint booth, identified as PB1, will be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (a) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the blasting operation shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this paint booth PB-1 and the blasting operation and their control devices. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

SECTION D.2

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (c) Three (3) wood-fired stoves, using clean wood only, with a heat input capacity of 0.06 MMBtu/hr each, using no controls and exhausting outside.

Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.2.1 Wood-fired Stoves Fuel Limitation [326 IAC 2-5.5-1] [40 CFR Part 60, Subpart AAAA] [40 CFR Part 60, Subpart EEEE] [326 IAC 12]

- (a) In order to comply with 326 IAC 2-5.5-1, the Permittee shall only combust clean wood in the three (3) wood-fired stoves. Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).
- (b) In order to render the provisions of 40 CFR 60, Subpart AAAA, not applicable, the Permittee shall not combust municipal solid waste, as defined in 40 CFR 60.1465, in the three (3) wood-fired stoves. Municipal solid waste includes: household, commercial/retail, or institutional waste. Household waste includes material discarded by residential dwellings, hotels, motels, and other similar permanent or temporary housing. Commercial/retail waste includes material discarded by stores, offices, restaurants, warehouses, nonmanufacturing activities at industrial facilities, and other similar establishments or facilities. Institutional waste includes materials discarded by schools, by hospitals (nonmedical), by nonmanufacturing activities at prisons and government facilities, and other similar establishments or facilities.
- (c) In order to render the provisions of 40 CFR 60, Subpart EEEE, not applicable, the Permittee shall not combust municipal solid waste, as defined in 60 CFR 60.2977, in the three (3) wood-fired stoves. Municipal solid waste includes refuse (and refuse-derived fuel) collected from the general public and from residential, commercial, institutional, and industrial sources consisting of paper, wood, yard wastes, food wastes, plastics, leather, rubber, and other combustible materials and non-combustible materials such as metal, glass and rock. Municipal solid waste does not include industrial process wastes or medical wastes that are segregated from such other wastes.

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

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	New Point Products Inc.
Address:	8563 Highway 46
City:	New Point, Indiana 47263
Phone Number:	(812) 663-6311
Registration No.:	031-30732-00025

I hereby certify that New Point Products Inc. is :

still in operation.

I hereby certify that New Point Products Inc. is :

no longer in operation.

in compliance with the requirements of Registration No. 031-30732-00025.

not in compliance with the requirements of Registration No. 031-30732-00025.

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name: New Point Products Inc.
Source Location: 8563 Highway 46, New Point, IN 47263
County: Decatur
SIC Code: 3364 (Nonferrous Die-Castings, Except Aluminum)
Registration No.: 031-30732-00025
Permit Reviewer: Bruce Farrar

On July 21, 2011, the Office of Air Quality (OAQ) received an application from New Point Products Inc. related to the construction and operation of new emission units and the continued operation of an existing zinc die casting, spin casting, and slush casting production facility.

Existing Approvals

The source has been operating under Exemption No. 031-15573-00025, issued on April 3, 2002.

County Attainment Status

The source is located in Decatur County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Decatur County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Decatur County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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

Fugitive Emissions

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by New Point Products, Inc. on July 21, 2011, relating to the addition of equipment used for die casting including furnaces, molds and painting.

The source consists of the following existing emission units:

- (a) One (1) paint booth, identified as PB1, constructed in 2002, using dipping and one (1) low pressure air atomization spray gun, with a maximum capacity of 15 metal parts per hour, using dry filters for particulate control, and exhausting inside the building.
- (b) One (1) enclosed pneumatic blasting unit, constructed in 2002, using sand as a media, with a maximum capacity of 10 pounds of steel per hour, using no controls, and exhausting inside.
- (c) Three (3) wood-fired stoves, using clean wood only, with a heat input capacity of 0.06 MMBtu/hr each, using no controls and exhausting outside.

Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

- (d) One (1) electrically heated wastewater evaporator for evaporating a non-organic solvent (water and a non-VOC and non-HAP solvent) for cleaning of small parts.
- (e) One (1) propane fired melt furnace, identified as F1, constructed in 2002, used for slush casting with a maximum capacity of 25.00 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F1.
- (f) One (1) propane fired melt furnace, identified as F2, constructed in 2002, used for spin casting with a maximum capacity of 7.50 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F2.
- (g) One (1) propane fired melt furnace, identified as F3, constructed in 2002, used for spin casting with a maximum capacity of 2.00 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F3.
- (h) One (1) propane fired melt furnace, identified as F4, constructed in 2002, used for die casting with a maximum capacity of 10.00 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F4.

- (i) One (1) die casting machine, identified as FD4, constructed in 2002, with a maximum capacity of 3.5 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack FD4.
- (j) One (1) propane fired melt furnace, identified as F5, constructed in 2002, used for die casting with a maximum capacity of 10pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F5.
- (k) One (1) propane fired melt furnace, identified as F6, constructed in 2002, used for spin casting with a maximum capacity of 2.00 pounds of Zinc-Aluminum metal per hour, using no control equipment, and exhausting to stack F6.
- (l) One (1) copper and brass electroplating tanks, identified as Tank1 and Tank2, constructed in 2002, with a maximum capacity of one (1) pound of copper or brass per hour, each, using no control equipment, and exhausting inside.
- (m) Welding operation used for non-production mold maintenance consisting of:
 - (1) One (1) TIG welder.
 - (2) One (1) MIG welder.
 - (3) One Arc welder.
- (n) Woodworking operation used for non-production mold making and maintenance, consisting of:
 - (1) Three (3) belt sanders.
 - (2) One (1) 12 inch band saw.
 - (3) One (1) enclosed CNC mill.
 - (4) One (1) enclosed CNC lathe.
 - (5) One (1) 12 inch disk sander.
 - (6) One (1) 10 inch table saw.
 - (7) One (1) 6 1/8 joiner.
 - (8) One (1) miter saw.
 - (9) One (1) 12.5 inch SHP planar.
 - (10) One (1) bench drill press.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Evaporator	-	-	-	-	-	-	-	-	-	-
Melt Furnaces (F1 to F6)	1.24E-02	1.20E-02	1.20E-02	-	-	0.29	-	-	-	-
Casting	2.76	1.59	1.59	-	-	0.31	-	-	-	-
Surface Coating (PB1)	-	-	-	-	-	0.71	-	-	0.98	0.91
Blasting	3.46	2.42	2.42	-	-	-	-	-	-	-
Electroplating (Tank1 and Tank2)	1.31E-04	1.31E-04	1.31E-04	-	-	-	-	-	4.40E-04	4.26E-04
Woodworking Operation	2.19	2.19	2.19	-	-	-	-	-	-	-
Welding Operation	0.21	0.21	0.21	-	-	-	-	-	0.05	0.01
Propane Combustion	0.003	0.010	0.010	0.021	0.18	0.014	0.10	175	-	-
Wood- Burning Stoves	-	1.73	-	0.023	0.16	2.47	13.0	-	-	-
Total PTE of Entire Source	8.63	8.15	6.43	0.04	0.34	3.79	13.10	175	<25	<10
Exemptions Levels**	5	5	5	10	10	10	25	100,000	25	10
Registration Levels**	25	25	25	25	25	25	100	100,000	25	10
- = 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 ₂ 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.										

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of pollutants are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued. This source has an electroplating operation. However, it does not use chrome electroplating, therefore 326 IAC 2-6.1-3(a) does not apply.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

- (c) 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 CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the registration, since the wood-fired stoves are not steam generating units.
- (b) The requirements of the New Source Performance Standard for Primary Aluminum Reduction Plants, 40 CFR 60, Subpart S (326 IAC 12), are not included in the registration, since facility is not a potroom group or anode bake plant located at a primary aluminum reduction plant.
- (c) The requirements of the New Source Performance Standard for Ferroalloy Production Facilities, 40 CFR 60, Subpart Z (326 IAC 12), are not included in the registration, since facility does not have an electric submerged arc furnaces or dust handling equipment.
- (d) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the registration, since facility does not surface coat metal furniture.
- (e) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances 40 CFR 60, Subpart SS (326 IAC 12), are not included in the registration, since facility does not surface coat large appliances.
- (f) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (326 IAC 12), are not included in the registration, since facility does not surface coat metal coil.
- (g) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW (326 IAC 12), are not included in the registration, since facility does not surface coat beverage cans.
- (h) In order to render the provisions of New Source Performance Standard for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001, 40 CFR 60, Subpart AAAA, not applicable, the Registrant shall not combust municipal solid waste, as defined in 40 CFR 60.1465, in the three (3) wood-fired stoves. Municipal solid waste includes: household, commercial/retail, or institutional waste. Household waste includes material discarded by residential dwellings, hotels, motels, and other similar permanent or temporary housing. Commercial/retail waste includes material discarded by stores, offices, restaurants, warehouses, nonmanufacturing activities at industrial facilities, and other similar establishments or facilities. Institutional waste includes materials discarded by schools, by hospitals (nonmedical), by nonmanufacturing activities at prisons and government facilities, and other similar establishments or facilities.
- (i) In order to render the provisions for New Source Performance Standard for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006 of 40 CFR 60, Subpart EEEE, not applicable, the Registrant shall not combust municipal solid waste, as defined in 60 CFR 60.2977, in the three (3) wood-fired stoves. Municipal solid waste includes refuse (and refuse-derived fuel) collected from the general public and from residential, commercial,

institutional, and industrial sources consisting of paper, wood, yard wastes, food wastes, plastics, leather, rubber, and other combustible materials and non-combustible materials such as metal, glass and rock. Municipal solid waste does not include industrial process wastes or medical wastes that are segregated from such other wastes.

- (j) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (k) The requirements of the Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, (40 CFR 63.340 Subpart N) (326 IAC 20-8) are not included in this registration, since this source does not use decorative chromium electroplating.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3880, Subpart MMMM (4M)) are not included for this registration, because this source is not a major source for HAPs.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards Primary Nonferrous Metals Area Sources—Zinc, Cadmium, and Beryllium (40 CFR 63.11160, Subpart GGGGGG (6G)), are not included for this registration, because the source is not a primary zinc production facility.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, (40 CFR 63.11169, Subpart HHHHHH (6H)), are not included for this registration, because the source does not perform paint stripping using paint strippers that contain methylene chloride (MeCl), performs autobody refinishing operations, or has spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (o) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, (40 CFR 63.11193, Subpart JJJJJJ (6J)), are not included for this registration, because the wood-fired stoves are not boilers.
- (p) The requirements of the National Emission Standards for Hazardous Air Pollutants for Secondary Nonferrous Metals Processing Area Sources (40 CFR 63.11462, Subpart TTTTTT (6T)), are not included for this registration, because the source is not a secondary nonferrous metals processing facility.
- (q) The requirements of the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations (40 CFR 63.11504, Subpart WWWWWW (6W)), are not included for this registration, because the source does not use any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel.
- (r) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X)), are not included for this registration, because this source's SIC is not listed.
- (s) The requirements of the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries (40 CFR 63.11544, Subpart ZZZZZZ (6Z)), are not included for this registration, because the source's annual metal melt production is less than 600 tons per year (tpy) of aluminum, copper, and other nonferrous metals, including all associated alloys.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Electrically Heated Wastewater

- (h) 326 IAC 8-3-1 (Organic Solvent Degreasing Operations)
The Electrically Heated Wastewater operation uses a non-organic solvent (water and a non-VOC and non-HAP solvent), therefore 326 IAC 8-3-1 does not apply.
- (i) There are no 326 IAC 8 Rules that are applicable to the facility.

Propane Fired Melt Furnaces: F1 through F6, FD4

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the propane fired melt furnaces, F1 through F6, are exempt from the requirements of 326 IAC 6-3-2, because each furnace has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (k) 326 IAC 8-1-6 (New Facilities General Reduction Requirements)
The potential VOC emissions from this source are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

Paint Booth (PB1)

- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The paint booth, identified as PB1, does not use roll, flow or brush coating and has the potential to use more than five (5) gallons of paint per day, therefore, 326 IAC 6-3-2 applies. Pursuant to 326 IAC 6-3-2(d), particulate from the paint booth shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is no visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (m) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
Pursuant to 326 IAC 8-1-1(b), the potential to emit VOC from spray booth PB1 is less than (15) pounds per day, therefore rendering the requirements of 326 IAC 8-2-9 are not applicable.

Blasting Operation

- (n) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the blasting operation shall not exceed 0.551 pounds per hour when operating at a process weight rate of 10 pounds per hour.

Copper and Brass Electroplating Tanks

- (o) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1b(14), the copper and brass electroplating tanks, are exempt from the requirements of 326 IAC 6-3-2 because they have potential particulate emissions less than 0.551 pounds per hour.
- (p) 326 IAC 20-8 (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks)
The copper and brass electroplating tanks, are exempt from the requirements of 326 IAC 20-8, because the source does not use chromium in their electroplating.

Welding Operation

- (q) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3-2 because they consume less than 625 pounds of rod or wire per day

Woodworking Operation

- (r) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1.5(2), the woodworking operation is exempt from the requirements of 326 IAC 6-3-2, because it does not meet the definition a "manufacturing process". The woodworking operation is not any single or series of actions, operations, or treatments in which a mechanical, physical, or chemical transformation of material occurs that emits, or has the potential to emit, particulate in the production of the product. The term includes transference, conveyance, or repair of a product. The woodworking operation is used in mold making and maintenance.

Wood-fired Stoves

- (s) 326 IAC 4-2-1 (Incinerators)
The requirements of 326 IAC 4-2-1 are not applicable to the three (3) wood-fired stoves, because they do not meet the definition of an incinerator pursuant to 326 IAC 1-2-34 are not indirect heating sources.
- (t) 326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
The requirements of 326 IAC 6-2-1 are not applicable to the three (3) wood-fired stoves, because they are not indirect heating sources.
- (u) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 are not applicable to the three (3) wood-fired stoves, because they do not meet the definition of a manufacturing process pursuant to 326 IAC 6-3-1.5(2).
- (v) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on July 21, 2011.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 031-30732-00025. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

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

**Company Name: New Point Products Inc.
Address City IN Zip: 8563 Highway 46, New Point, IN 47263
Permit Number: 031-30732-00025
Plt ID: 031-00025
Permit Reviewer: Bruce Farrar (rev by V. Cordell 9/21/2011)
Date: July 21, 2011**

Uncontrolled Potential to Emit (PTE) Tons/Year										
Process	Pollutant									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Total HAPs	Single HAP
Evaporator	-	-	-	-	-	-	-	-	-	-
Furnaces	1.24E-02	1.20E-02	1.20E-02	-	-	0.29	-	-	-	-
Casting	2.76	1.59	1.59	-	-	0.31	-	-	-	-
Surface Coating	-	-	-	-	-	0.71	-	-	0.95	0.91
Blasting	3.46	2.42	2.42	-	-	-	-	-	-	-
Electroplating	1.31E-04	1.31E-04	1.31E-04	-	-	-	-	-	-	-
Woodworking Operation*	2.19	2.19	2.19	-	-	-	-	-	-	-
Welding Operation*	0.21	0.21	0.21	-	-	-	-	-	0.05	0.01
Propane Combustion	0.003	0.010	0.010	0.021	0.178	0.014	0.103	175	-	-
Wood Combustion		1.723		0.023	0.158	2.467	12.997			
Total	8.63	8.15	6.43	0.04	0.34	3.79	13.10	175	<25	<10

* Woodworking and welding operations are not used in production, but use to construct and maintain molds and forms.

Company Name: New Point Products, Inc.
 Address City IN Zip: 8563 Highway 46, New Point, IN 47263
 Exemption No: 031-30732-00025
 Plt ID: 031-00025
 Reviewer: Bruce Farrar
 Date: July 21, 2011

Emission Units (ID)	Process Rate (ton/hr)	PM Emission Factor (lb/ton) ¹	PM10 Emission Factor (lb/ton) ²	VOC Emission Factor (lb/ton) ³
Johnson Gas 718 (F1)	0.0125	0.1	0.09	2.4
Johnson Gas 200 (F2)	0.00375	0.1	0.09	2.4
Buzzer Type 160 (F3)	0.001	0.1	0.09	2.4
Johnson Gas 379 (F4)	0.005	0.1	0.09	2.4
Johnson Gas 379 (F5)	0.005	0.1	0.09	2.4
Buzzer Type 160 (F6)	0.001	0.1	0.09	2.4

	PM Emissions (lb/hour)	PM Emissions (ton/year)	PM10 Emissions (lb/hour)	PM10 Emissions (ton/year)	VOC Emissions (lb/hour)	VOC Emissions (ton/year)
Johnson Gas 718 (F1)	1.25E-03	0.01	1.13E-03	4.82E-03	3.00E-02	1.28E-01
Johnson Gas 200 (F2)	0.000375	0.00	3.38E-04	1.44E-03	9.00E-03	3.85E-02
Buzzer Type 160 (F3)	0.0001	0.00	0.00E+00	0.00E+00	2.40E-03	1.03E-02
Johnson Gas 379 (F4)	0.0005	0.00	4.50E-04	1.93E-03	1.20E-02	5.14E-02
Johnson Gas 379 (F5)	0.0005	0.00	4.50E-04	1.93E-03	1.20E-02	5.14E-02
Buzzer Type 160 (F6)	0.0001	0.00	4.50E-04	1.93E-03	2.40E-03	1.03E-02
Totals:	0.003	0.012	0.003	0.012	0.068	0.290

1. Emission factors from WebFIRE, SCC 3-04-008-03, downloaded August 19, 2011
2. Emission factors from WebFIRE, SCC 3-04-008-03, downloaded August 19, 2011
3. Emission factors from WebFIRE, SCC 3-04-008-03, downloaded August 19, 2011

METHODOLOGY

VOC PTE Pounds per Hour = Process weight (lbs/hr) * VOC emission factor (lbs/ton)
 VOC PTE Tons per Year = Process weight (lbs/hr) * VOC emission factor (lbs/ton) * (8760 hr/yr) * (1 ton/2000 lbs)
 PM/PM2.5 PTE pounds per hour = Process weight (lbs/hr) * PM/PM10 emission factor (lbs/ton)
 Pm/PM10 PTE Tons per Year = Process weight (lbs/hr) * PM/PM10 emission factor (lbs/ton) * (8760 hrs/yr) * (1 ton/2000 lbs)

Company Name: New Point Products, Inc.
 Address City IN Zip: 8563 Highway 46, New Point, IN 47263
 Exemption No: 031-30732-00025
 Plt ID: 031-00025
 Reviewer: Bruce Farrar
 Date: July 21, 2011

Emission Units (ID)	Process Rate (ton/hr)	PM Emission Factor (lb/ton) ¹	PM10 Emission Factor (lb/ton) ²	VOC Emission Factor (lb/ton) ³
die casting, slush casting, spin casting	0.03	21	12.4	2.4

	PM Emissions (lb/hour)	PM Emissions (ton/year)	PM10 Emissions (lb/hour)	PM10 Emissions (ton/year)	VOC Emissions (lb/hour)	VOC Emissions (ton/year)
die casting, slush casting, spin casting	6.30E-01	2.76E+00	3.72E-01	1.59E+00	7.20E-02	3.08E-01
Totals:	0.63	2.76	0.37	1.59	0.07	0.31

No emission factors were provided with application; assumed worst case EFs for most conservative PTE calculations. (VC)

1. Emission factor from WebFIRE version 6.24, SCC 3-04-002-19, charging a crucible furnace with Brass/Bronze (VC)
2. Emission factor from WebFIRE version 6.24, SCC 3-04-002-19, charging a crucible furnace with Brass/Bronze (VC)
3. Emission factors from WebFIRE, SCC 3-04-008-03, downloaded August 19, 2011

METHODOLOGY

VOC PTE Pounds per Hour = Process weight (lbs/hr) * VOC emission factor (lbs/ton)
 VOC PTE Tons per Year = Process weight (lbs/hr) * VOC emission factor (lbs/ton) * (8760 hr/yr) * (1 ton/2000 lbs)
 PM and PM10 pounds per hour = Process weight (lbs/hr) * emission factor (lbs/ton)
 PM and PM10 PTE (tons/year) = Process weight (lbs/hr) * emission factor (lbs/ton) *(8760 hrs/yr) *(1 ton/2000 lbs)

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: New Point Products, Inc.
Address City IN Zip: 8563 Highway 46, New Point, IN 47263
Permit Number: 031-30732-00025
Plt ID: 031-00025
Permit Reviewer: Bruce Farrar
Date: July 21, 2011

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)
Gold Laquer for Brass	7.8	0.00140	15.00	5.00%	35.00%	0.04	0.25
Thinner	7.2	0.00140	15.00	0.00%	100.00%	0.00	0.66

Total State Potential Emissions **0.04** **0.91**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Abrasive Blasting - Confined**

Company Name: New Point Products, Inc.
Address City IN Zip: 8563 Highway 46, New Point, IN 47263
Exemption No: 031-30732-00025
Pit ID: 031-00025
Reviewer: Bruce Farrar
Date: September 21, 2011

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	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate (FR1) of sand through a blasting nozzle as a function of nozzle pressure and internal diameter (ID1)

Nozzle Type (diameter)	Internal diameter, in	Nozzle Pressure (psig)							
		30	40	50	60	70	80	90	100
No. 2 (1/8 inch)	0.125	28	35	42	49	55	63	70	77
No. 3 (3/16 inch)	0.1875	65	80	94	107	122	135	149	165
No. 4 (1/4 inch)	0.25	109	138	168	195	221	255	280	309
No. 5 (5/16 inch)	0.3125	205	247	292	354	377	420	462	507
No. 6 (3/8 inch)	0.375	285	355	417	477	540	600	657	720
No. 7 (7/16 inch)	0.4375	385	472	560	645	755	820	905	940
No. 8 (1/2 inch)	0.5	503	615	725	835	945	1050	1160	1265
No. 10 (5/8 inch)	0.625	820	990	1170	1336	1510	1680	1850	2030
No. 12 (3/4 inch)	0.75	1140	1420	1670	1915	2160	2400	2630	2880
No. 16 (1 inch)	1	2030	2460	2900	3340	3780	4200	4640	5060

CALCULATIONS

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters	
Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)	
D1 = Density of sand from Table 2 =	99 lb/ft3
ID1 = Internal diameter of nozzle for sand blasting = 1/16"	0.0625 inch
FR1 = Sand flow rate as extrapolated from Table 3 =	19.25 lb/hr
D = Density of actual abrasive =	99 lb/ft3
ID = internal diameter of actual nozzle =	0.0625 inch
FR = Flow rate of actual abrasive (lb/hr) =	19.3 lb/hr (per nozzle)

Potential to Emit Before Control	
FR = Flow rate of actual abrasive (lb/hr) =	19.3 lb/hr (per nozzle)
w = fraction of time of wet blasting =	0 %
N = number of nozzles =	1
EF = PM emission factor for actual abrasive from Table 1 =	0.041 lb PM/ lb abrasive
PM10 emission factor ratio for actual abrasive from Table 1 =	0.70 lb PM10 / lb PM
Potential to Emit (before control) =	PM 0.789 PM10 0.552 lb/hr
=	18.94 13.26 lb/day
=	3.46 2.42 ton/yr

Potential to Emit After Control	
Emission Control Device Efficiency =	PM 99.9% PM10 99.9%
Potential to Emit (after control) =	7.9E-04 5.5E-04 lb/hr
=	0.019 0.013 lb/day
=	0.003 0.002 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)

Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

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]

Extrapolation from Table 3 from 1/8" diameter nozzle to 1/16" diameter nozzle, at 100 psig nozzle pressure:
 blast media velocity (ft/hr) = media flow rate (lb/hr) / [nozzle cross sectional area (ft²) x media density (lb/ft³)
 for 1/8 inch internal diameter nozzle, nozzle area (in²) = πr² = π [(1/8 inch)/2]² = 0.012272 square inch
 blast media velocity (ft/hr) = (77 lb/hr flow rate) / [0.012272 sq.in. / (144 sq.in./sq.ft.) x 99 lb/ft³] = 9126.5 ft/hr
 for 1/16 inch internal diameter nozzle, nozzle area (sq.in.) = πr² = π [(1/16 inch)/2]² = 0.003068 square inch
 Flow rate (lb/hr) = nozzle area (ft²) x media velocity (ft/hr) x media density (lb/ft³)
 for 1/16 inch diameter nozzle, Flow Rate = (0.003068 in²) / (144 in²/ft²) x (9126.5 ft/hr) x (99 lb/ft³) = 19.25 lb/hr

**Appendix A: Emission Calculations
PM/PM10/PM2.5
Electroplating Cooper and Brass**

**Company Name: New Point Products, Inc.
Address City IN Zip: 8563 Highway 46, New Point, IN 47263
Exemption No: 031-30732-00025
Pit ID: 031-00025
Reviewer: Bruce Farrar
Date: July 21, 2011**

Max. Capacity
(Amp)

0.42

These tanks are controlled by a cover.

Emission Factor in grains/A-hr	Emission Unit	PM* 0.25
Potential to Emit before Control in tons/yr	Copper	6.57E-05
	Brass	6.57E-05
	Total	1.31E-04

Emission factors are from AP-42, Table 12.20-1 for Chromium Electroplating (07/96).

* Assume PM emissions are equal to PM10 and PM2.5 emissions.

Methodology:

PTE before Control (tons/yr) = Max. Capacity (A) x 8760 hr/yr x Emission Factor (grain/A-hr) x 1 lbs/7000 grains x 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Woodworking Operations**

Company Name: New Point Products, Inc.
Address City IN Zip: 8563 Highway 46, New Point, IN 47263
Exemption No: 031-30732-00025
Plt ID: 031-00025
Reviewer: Bruce Farrar
Date: July 21, 2011

PM/PM10/PM2.5 emissions are estimated at 0.5 lbs of PM per hour. Woodworking is used for non-production mold/form maintenance. No unit is used continuously.

Amount Collected	0.5 lb/hr all units
Hours	8760 hr/yr
Uncontrolled Emissions =	2.19 tons/yr

Methodology

Uncontrolled Emissions = Amount Collected (lb/unit/hr) * Hours (hours/yr) / 2000 (lbs/ton)

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: New Point Products, Inc.
Address City IN Zip: 8563 Highway 46, New Point, IN 47263
Exemption No: 031-30732-00025
Plt ID: 031-00025
Reviewer: Bruce Farrar
Date: July 21, 2011

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Submerged Arc	1	1	0.036	0.011			0.036	0.011	0.000	0	0.011
Metal Inert Gas (MIG)(carbon steel)	1	1	0.0055	0.0005			0.006	0.001	0.000	0	0.001
Tungsten Inert Gas (TIG)(carbon steel)	1	1	0.0055	0.0005			0.006	0.001	0.000	0	0.001
EMISSION TOTALS											
Potential Emissions lbs/hr							0.05				0.01
Potential Emissions lbs/day							1.13				0.29
Potential Emissions tons/year							0.21				0.05

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
LPG-Propane - Commercial Boilers
 (Heat input capacity: > 0.3 MMBtu/hr < 10 MMBtu/hr)

Company Name: New Point Products, Inc.
Address City IN Zip: 8563 Highway 46, New Point, IN 47263
Exemption No: 031-30732-00025
Plt ID: 031-00025
Reviewer: Bruce Farrar
Date: July 21, 2011

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

SO2 Emission factor = 0.10 x S

S = Sulfur Content = 15.00 grains/100ft³

0.29

27.38

Emission Factor in lb/kgal	Pollutant						
	PM*	PM10*	direct PM2.5**	SO2	NOx	VOC	CO
	0.2	0.7	0.7	1.5 (0.10S)	13.0	1.0 **TOC value	7.5
Potential Emission in tons/yr	2.74E-03	9.58E-03	9.58E-03	2.05E-02	1.78E-01	1.37E-02	1.03E-01

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.

** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

Propane Emission Factors shown. Please see AP-42 for butane.

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

See Page 10 for Greenhouse Gas calculations.

Appendix A: Emission Calculations
LPG-Propane - Industrial Boilers
(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)
Greenhouse Gas

Company Name: New Point Products Inc.
Address City IN Zip: 8563 Highway 46, New Point, IN 47263
Permit Number: 031-30732-00025
Plt ID: 031-00025
Reviewer: Bruce Farrar
Date: July 21, 2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/kgal	12,500	0.2	0.9
Potential Emission in tons/yr	171	0.0	0.0
Summed Potential Emissions in tons/yr	171		
CO2e Total in tons/yr	175		

Methodology

The CO2 Emission Factor for Propane is 12500. The CO2 Emission Factor for Butane is 14300.

Emission Factors are from AP 42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/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).

**Estimated Emissions Calculations
External Combustion**

Residential Wood Combustion, Pre-Phase I, Conventional (uncontrolled)

**Company Name: New Point Products, Inc.
Address City IN Zip: 8563 Highway 46, New Point, IN 47263
Permit #: 031-30732-00025
Plt ID: 031-00025
Reviewer: Bruce Farrar
Date: July 21, 2011**

Capacity (MMBtu/hr) = 0.225 = total for 3 units, estimated at maximum of 75,000 Btu/hr each based on similar units
 Capacity (tons/hr) = 0.012857143 = capacity (MMBtu/hr) / heating value of fuel (MMBtu/ton)
 Heating Value of Fuel (MMBtu/ton) = 17.5 = default value from AP-42 1.10.3 Controls

	Pollutant						
	PM*	PM10**	PM2.5*	SO2	NOx	VOC***	CO
Emission Factor in lb/ton		30.6		0.4	2.8	43.8	230.8
Potential Emissions in tons/yr		1.72		0.02	0.16	2.47	13.00
Emissions in lb/hr		0.39					

Emission Factors from AP-42, table 1.10-1, dated 10/1996.

* No PM or PM2.5 emission factors are provided in AP-42 or webFIRE.

A small portion of wood stove particulate emissions includes "solid" particles of elemental carbon and wood. The vast majority of particulate emissions are condensed organic products of incomplete combustion equal to or less than 10 micrometers in aerodynamic diameter (PM-10). Although reported particle size data are scarce, one reference states that 95 percent of the particles emitted from a wood stove were less than 0.4 micrometers in size. (Source: J. A. Rau and J. J. Huntzicker, Composition And Size Distribution Of Residential Wood Smoke Aerosols, Presented at

** PM10 is defined as equivalent to total catch by EPA method 5H train.

*** VOC emission factor is from webFIRE; AP-42 emission factor for Total Organic Compounds is higher.

The Registrant shall only combust clean wood in the three (3) wood-fired stoves. Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

Methodology

Converted from MMBtu/hr to tons/hr capacity:

Capacity (tons/hr) = Heat Input Capacity (1 MMBtu/hr) / Heating Value of wood fuel (17.5 MMBtu/ton)

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

Emission Factors are from AP-42 Chapter 1.10 (revised 10/96) and webFire.

PM emissions in lb/hr = Emission Factor (lb/ton) / Capacity (ton/hr)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Paul F Laugle
New Point Products, Inc.
PO Box 92
New Point, IN 47263

DATE: December 5, 2011

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

SUBJECT: Final Decision
Registration
031-30732-00025

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:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 12/5/2011 New Point Products Inc. 031-30732-00025 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Paul F Laugle New Point Products Inc. PO Box 92 New Point IN 47263 (Source CAATS) via confirmed delivery										
2		Decatur County Commissioners 150 Courthouse Square Greensburg IN 47240 (Local Official)										
3		Decatur County Health Department 801 N. Lincoln St Greensburg IN 47240-1397 (Health Department)										
4		Mr. Leonard Rohls 8504 North County Road 300 West Batesville IN 47006 (Affected Party)										
5		Melanie Brassell 606 Nelsons Parkway, P.O. Box 465 Wakarusa IN 46573 (Affected Party)										
6												
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