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: October 14, 2011

RE: Rightway Fasteners, Inc / 005-30934-00048

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
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

Doug Logan, Chemical and Environmental Engineer
Rightway Fasteners, Inc.
7945 S. International Drive
Columbus, IN 47201

October 14, 2011

Re: 005-30934-00048
Second Notice-Only Change to
M005-18698-00048

Dear Mr. Logan:

Rightway Fasteners, Inc. was issued a Minor Source Operating Permit (MSOP) No. M005-18698-00048 on December 30, 2008 for a stationary metal products and fasteners manufacturing plant located at 7945 S. International Drive, Columbus, IN 47201.

On September 19, 2011, the Office of Air Quality (OAQ) received an application from the source requesting that the permit be updated to indicate that the Sonicor Model LDR-09 vapor degreaser has been dismantled and scrapped and should be removed from the permit. This change at the source is considered a "minor physical change" as defined in 326 IAC 2-1.1-1(6). Pursuant to 326 IAC 2-1.1-3(h)(2), minor physical changes to a source do not require a permit revision under 326 IAC 2-6.1-6, if the minor physical change does not increase potential emissions from the source. This change to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(2). See attached updated Appendix A – Emissions Calculations – with the emissions from the vapor degreaser removed.

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby revised as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

1. Section A.2 - Emission Units and Pollution Control Equipment Summary has been updated to show the removal of the one (1) Sonicor model LDR-09 vapor degreaser.

...

(b) Degreasing Operations:

~~(1) One (1) Sonicor model LDR-09 vapor degreaser for fasteners, associated with the A-Line, constructed in 2006, with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel fasteners per hour.~~

(~~1~~**1**) One (1) D-Line aqueous degreaser, constructed in 2003, with a capacity of 5,200 lbs of steel fasteners per hour.

(~~2~~**2**) One (1) natural gas-fired dryer, included in the D-Line aqueous degreaser, constructed in 2003, venting to stack 9.

...

2. Section D.2. – Emissions Unit Operation Conditions has been removed because the Emission Limitations and Standards for Volatile Organic Compounds (VOC) [326 IAC 8-3-3] applied to the Sonicor model LDR-09 vapor degreaser, which has been removed from the source. The D-Line aqueous degreaser has no VOC emissions as it is a water-based cleaning system.

SECTION D.2 EMISSIONS UNIT OPERATIONS CONDITIONS

Emissions Unit Description

Degreasing Operations:

(1) One (1) Sonicor model LDR-09 vapor degreaser for fasteners, associated with the B-Line, constructed in 2006, with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel fasteners per hour.

(2) One (1) D-Line aqueous degreaser, constructed in 2003, with a capacity of 5,200 lbs of steel fasteners per hour.

(3) One (1) natural gas-fired dryer, included in the D-Line aqueous degreaser, constructed in 2003, venting to stack 9.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations constructed after January 1, 1980, including the Sonicor model LDR-09 vapor degreaser, the Permittee shall:

(a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;

(b) Keep the cover closed at all times except when processing workloads through the degreaser;

(c) Minimize solvent carry-out by:

(1) Racking parts to allow complete drainage;

(2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;

(3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;

(4) Tipping out any pools of solvent on the cleaned parts before removal;

(5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;

(d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;

(e) Not occupy more than half of the degreaser's open top area with the workload;

(f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;

(g) Never spray above the vapor level;

~~(h) Repair solvent leaks immediately, or shut down the degreaser;~~
~~(i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;~~

~~(j) Not use workplace fans near the degreaser opening;~~

~~(k) Not allow visually detectable water in the solvent exiting the water separator; and~~

~~(l) Provide a permanent, conspicuous label summarizing the operating requirements.~~

~~**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**~~

~~D.2.2 Record Keeping Requirements [326 IAC 2-6.1-5(a)(2)]~~

~~(a) To document the compliance status with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with Condition D.2.1.~~

~~(1) The VOC and HAP content of the degreaser used.~~

~~(2) The amount of VOC used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(3) The volume weighted VOC and HAP content of the degreaser used for each day.~~

~~(4) The total VOC and HAP usage for each day.~~

~~(b) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.~~

...

3. The Sections D.3, D.4, and D.5 have been renumbered to reflect the change described above.

Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO2 equivalent emissions (CO2e). Therefore, CO2e emissions have been calculated for this source. Based on the calculations the unlimited potential to emit greenhouse gases from the entire source is less than 100,000 tons of CO2e per year (see Appendix A for detailed calculations). This requires no changes to the permit.

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

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 Sarah Germann, of my staff, at 317-232-8427 or 1-800-451-6027, and ask for extension 2-8427.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit
Appendix A – Emissions Calculations

IC/sg

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

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

Minor Source Operating Permit
OFFICE OF AIR QUALITY

Rightway Fasteners
7945 S. International Drive
Columbus, Indiana 47201

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M005-18698-00048	
Issued by/Signed by: Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 30, 2008 Expiration Date: December 30, 2013

First Notice Only Change No.: M005-29850-00048, issued December 29, 2010

Second Notice Only Change No.: M005-30934-00048	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 14, 2011 Expiration Date: December 30, 2013

TABLE OF CONTENTS

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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metal products and fasteners manufacturing plant.

Source Address:	7945 S. International Drive, Columbus, Indiana 47201
General Source Phone Number:	812-342-2700
SIC Code:	3452, 3479
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

(a) Metal surface coating:

(1) One (1) dip/spin coater and cure oven, identified as A-Line, constructed in 1991 (coater replaced in 2007), with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stack 1.

(2) One (1) dip/spin coater and cure oven, identified as B-Line, constructed in 1991, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 3 and 4.

(3) One (1) dip/spin coater and cure oven, identified as C-Line, constructed in 1993, with a maximum capacity 2,200 pounds of steel fasteners per hour, and the cure oven venting to stack 5.

(4) One (1) dip/spin coater and cure oven, identified as D-Line, constructed in 2001, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 10, 11, and 12.

(5) One (1) dip/spin coater and cure oven, identified as E-Line, constructed in 2006, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 6, 7, and 8.

(6) One (1) dip/spin coater and cure oven, identified as Topcoater, constructed in 1993, with a maximum capacity 2,200 pounds of steel fasteners per hour, and the cure oven venting to stack 2.

(b) Degreasing Operations:

(1) One (1) Sonicor model LDR-09 vapor degreaser for fasteners, associated with the A-Line, constructed in 2006, with a daily solvent consumption of 5.0 gallons per day, and a maximum capacity of 660 lbs of steel fasteners per hour.

(2) One (1) D-Line aqueous degreaser, constructed in 2003, with a capacity of 5,200 lbs of steel fasteners per hour.

(3) One (1) natural gas-fired dryer, included in the D-Line aqueous degreaser, constructed in 2003, venting to stack 9.

(c) Heat Treating Operations:

(1) One (1) heat treating furnace line, identified as HA-01, constructed in 1996, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 19, 20, 21, and 22.

(2) One (1) heat treating furnace line, identified as HA-02, constructed in 1997, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 13, 14, 15, and 16.

(3) One (1) heat treating furnace line, identified as HA-03, constructed in 2004, with a capacity 550 pounds of steel fasteners per hour, venting to stacks 23, 24, 25, and 26.

(4) One (1) heat treating furnace line, identified as HA-04, constructed in 2005, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 27, 28, 29, and 30.

(5) One (1) heat treating furnace line, identified as HA-05, approved for construction in 2010, with a capacity 2,200 pounds of steel fasteners per hour and 3.5 MMBtu per hour, venting to stacks 35, 36, 37, 38 and 39.

(6) One (1) annealing furnace line, identified as HTA-01, constructed in 1996, with a capacity 730 pounds of steel fasteners per hour, venting to stacks 17 and 18.

(d) Plating operations, with a maximum line speed of 30 barrels per hour and a maximum loading of 110 pounds of steel fasteners per barrel:

(1) Cleaning and alkaline non-cyanide zinc plating processes controlled by one (1) packed bed scrubber constructed in 1998 with air flow rate of 24,000 cubic feet per minute (CFM), venting to stack 32, including:

(A) Two (2) degreasing tanks, designated as #1 and #2 Degreasers, constructed in 1998, with capacities of 370 and 690 gallons, respectively.

(B) One (1) alkaline electrocleaning tank, constructed in 1998, with a maximum capacity of 317 gallons.

(C) One (1) alkaline non-cyanide zinc electroplating tank, constructed in 1998, with a maximum capacity of 4,100 gallons.

(2) Hydrochloric acid pickling and related processes controlled by one (1) packed bed scrubber constructed in 1998 with air flow rate of 15,500 cubic feet per minute (CFM), venting to stack 33, including:

(A) One (1) pickling tank, designated as #1, constructed in 1998, each with a working capacity of 285 gallons.

(B) Two (2) acid electrocleaning tanks, designated as #1 Acid Electrocleaning, constructed in 1998, and #2 Acid Electrocleaning, converted to acid electrocleaning in 2000, with working capacities of 330 and 317 gallons, respectively.

(C) One (1) acid storage tank, constructed in 1998, with a capacity of 6,500 gallons.

(3) One (1) automated chromate coating system, constructed in 1998, including:

(A) Four (4) air-agitated coating tanks;

(B) Four (4) sets of two (2) counterflow rinse tanks;

(C) One (1) static sealer tank (not in service); and

(D) One (1) air-agitated sealer tank.

Each of the above tanks has a capacity of 120 gallons. The chromate coating system is a conversion coating process, in which no electrical current is applied. The chromium-containing mists from the coating processes are controlled by one (1) composite mesh pad mist eliminator with an air flow rate of 6,000 cubic feet per minute (CFM), venting to stack 31.

(4) One (1) natural gas-fired boiler, constructed in 1998, with a heat input of 1.5 MMBtu/hr, venting to stack 34.

(e) Blasting, grinding and machining operations, venting to stacks 13 through 30:

(1) Eight (8) steel shotblasting machines:

(A) One (1) steel shotblasting machine, identified as SBA-01, constructed in 1991, capable of processing 1,920 pounds per hour.

(B) One (1) steel shotblasting machine, identified as SBA-02, constructed in 1993, capable of processing 1,920 pounds per hour.

(C) One (1) steel shotblasting machine, identified as SBA-03, constructed in 1997, capable of processing 960 pounds per hour.

(D) One (1) steel shotblasting machine, identified as SBA-05, constructed in 2001, capable of processing 1,920 pounds per hour.

(E) One (1) steel shotblasting machine, identified as SBA-06, constructed in 2005, capable of processing 360 pounds per hour.

(F) One (1) steel shotblasting machine, identified as SBA-07, constructed in 2006, capable of processing 960 pounds per hour.

(G) One (1) steel shotblasting machine, identified as SBA-08, constructed in 2008, capable of processing 1,920 pounds per hour.

(H) One (1) steel shotblasting machine, identified as SBA-09, constructed in 1993, capable of processing 300 pounds per hour.

(2) One (1) sand blasting machine, identified as SBA-04, constructed in 2003, capable of processing 480 pounds per hour.

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M005-18698-00048, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(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.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(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 permit.

(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, Indiana 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.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(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 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.

(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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M005-18698-00048 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

(b) 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.18 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(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 permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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]

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

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

The Permittee shall not operate an incinerator 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]

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

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

(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.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

(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

C.12 Response to Excursions or Exceedances

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(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.

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

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

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

(b) 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.

(c) 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.

SECTION D.1 EMISSION UNIT OPERATIONS CONDITIONS

Emissions Unit Description

Metal surface coating.

(1) One (1) dip/spin coater and cure oven, identified as A-Line, constructed in 1991 (coater replaced in 2007), with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stack 1.

(2) One (1) dip/spin coater and cure oven, identified as B-Line, constructed in 1991, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 3 and 4.

(3) One (1) dip/spin coater and cure oven, identified as C-Line, constructed in 1993, with a maximum capacity 2,200 pounds of steel fasteners per hour, and the cure oven venting to stack 5.

(4) One (1) dip/spin coater and cure oven, identified as D-Line, constructed in 2001, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 10, 11, and 12.

(5) One (1) dip/spin coater and cure oven, identified as E-Line, constructed in 2006, with a maximum capacity 4,000 pounds of steel fasteners per hour, and the cure oven venting to stacks 6, 7, and 8.

(6) One (1) dip/spin coater and cure oven, identified as Topcoater, constructed in 1993, with a maximum capacity 2,200 pounds of steel fasteners per hour, and the cure oven venting to stack 2.

(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 2-6.1-5(a)(1)]

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

(a) The Permittee shall not allow the discharge of VOC into the atmosphere in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators of the dip/spin coaters, identified as A-Line, B-Line, C-Line, D-Line, E-Line, and Topcoater.

(b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Compliance Determination Requirements

D.1.2 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.3 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.

(1) The VOC content less water of each coating material and solvent used.

(2) The amount of coating material and solvent used.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month; and

(4) The total VOC usage for each month.

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

SECTION D.2 EMISSION UNIT OPERATIONS CONDITIONS

Emissions Unit Description

Heat Treating Operations:

(1) One (1) heat treating furnace line, identified as HA-01, constructed in 1996, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 19, 20, 21, and 22.

(2) One (1) heat treating furnace line, identified as HA-02, constructed in 1997, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 13, 14, 15, and 16.

(3) One (1) heat treating furnace line, identified as HA-03, constructed in 2004, with a capacity 550 pounds of steel fasteners per hour, venting to stacks 23, 24, 25, and 26.

(4) One (1) heat treating furnace line, identified as HA-04, constructed in 2005, with a capacity 2,200 pounds of steel fasteners per hour, venting to stacks 27, 28, 29, and 30.

(5) One (1) heat treating furnace line, identified as HA-05, approved for construction in 2010, with a capacity 2,200 pounds of steel fasteners per hour and 3.5 MMBtu per hour, venting to stacks 35, 36, 37, 38 and 39.

(6) One (1) annealing furnace line, identified as HTA-01, constructed in 1996, with a capacity 730 pounds of steel fasteners per hour, venting to stacks 17 and 18.

(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 2-6.1-5(a)(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the heat treating operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

SECTION D.3 EMISSION UNIT OPERATIONS CONDITIONS

Emissions Unit Description

Plating operations, with a maximum line speed of 30 barrels per hour and a maximum loading of 110 pounds of steel fasteners per barrel:

(1) Cleaning and alkaline non-cyanide zinc plating processes controlled by one (1) packed bed scrubber constructed in 1998 with air flow rate of 24,000 cubic feet per minute (CFM), venting to stack 32, includinng:

A) Two (2) degreasing tanks, designated as #1 and #2 Degreasers, constructed in 1998, with capacities of 370 and 690 gallons, respectively.

(B) One (1) alkaline electrocleaning tank, constructed in 1998, with a maximum capacity of 317 gallons.

(C) One (1) alkaline non-cyanide zinc electroplating tank, constructed in 1998, with a maximum capacity of 4,100 gallons.

(2) Hydrochloric acid pickling and related processes controlled by one (1) packed bed scrubber constructed in 1998 with air flow rate of 15,500 cubic feet per minute (CFM), venting to stack 33, including:

(A) One (1) pickling tank, designated as #1, constructed in 1998, each with a working capacity of 285 gallons.

(B) Two (2) acid electrocleaning tanks, designated as #1 Acid Electrocleaning, constructed in 1998, and #2 Acid Electrocleaning, converted to acid electrocleaning in 2000, with working capacities of 330 and 317 gallons, respectively.

(C) One (1) acid storage tank, constructed in 1998, with a capacity of 6,500 gallons.

(3) One (1) automated chromate coating system, constructed in 1998, including:

(A) Four (4) air-agitated coating tanks; and

(B) Four (4) rinse and sealer tank sets including:

(i) Two (2) counterflow rinse tanks;

(ii) One (1) static sealer tank; and

(iii) One (1) air-agitated sealer tank.

Each of the above tanks has a capacity of 120 gallons. The chromate coating system is a conversion coating process, in which no electrical current is applied. The chromium-containing mists from the coating processes are controlled by one (1) composite mesh pad mist eliminator with an air flow rate of 6,000 cubic feet per minute (CFM), venting to stack 31.

(4) One (1) natural gas-fired boiler, constructed in 1998, with a heat input of 1.5 MMBtu/hr, venting to stack 34.

(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 2-6.1-5(a)(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the plating operations, including the alkaline zinc electroplating line, hydrochloric acid pickling and related processes, and chromate coating system, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.3.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the one (1) natural gas fired boiler shall be limited to 0.6 pounds per MMBtu heat input.

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

D.3.3 Particulate Matter

Pursuant to 326 IAC 6-3-2(c), the packed bed scrubbers for PM control shall be in operation at all times when the alkaline zinc electroplating line, hydrochloric acid pickling and related processes, and chromate coating system are in operation.

SECTION D.4 EMISSION UNIT OPERATION CONDITIONS

Emissions Unit Description

Blasting, grinding and machining operations, venting to stacks 13 through 30:

(1) Eight (8) steel shotblasting machines:

(A) One (1) steel shotblasting machine, identified as SBA-01, constructed in 1991, capable of processing 1,920 pounds per hour.

(B) One (1) steel shotblasting machine, identified as SBA-02, constructed in 1993, capable of processing 1,920 pounds per hour.

(C) One (1) steel shotblasting machine, identified as SBA-03, constructed in 1997, capable of processing 960 pounds per hour.

(D) One (1) steel shotblasting machine, identified as SBA-05, constructed in 2001, capable of processing 1,920 pounds per hour.

(E) One (1) steel shotblasting machine, identified as SBA-06, constructed in 2005, capable of processing 360 pounds per hour.

(F) One (1) steel shotblasting machine, identified as SBA-07, constructed in 2006, capable of processing 960 pounds per hour.

(G) One (1) steel shotblasting machine, identified as SBA-08, constructed in 2008, capable of processing 1,920 pounds per hour.

(H) One (1) steel shotblasting machine, identified as SBA-09, constructed in 1993, capable of processing 300 pounds per hour.

(2) One (1) sand blasting machine, identified as SBA-04, constructed in 2003, capable of processing 480 pounds per hour.

(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 2-6.1-5(a)(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the blasting operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

D.4.2 Particulate Matter (PM)

The dust collectors used to control particulate matter shall be in operation at all times when the grinding and machining processes are in operation.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Rightway Fasteners
Address:	7945 S. International Drive
City:	Columbus, Indiana 47201
Phone #:	812-342-2700
MSOP #:	M005-29850-00048

I hereby certify that Rightway Fasteners is : ☐ still in operation. ☐ no longer in operation.

I hereby certify that Rightway Fasteners is : ☐ in compliance with the requirements of MSOP M005-29850-00048. ☐ not in compliance with the requirements of MSOP M005-29850-00048.

Authorized Individual (typed):
Title:
Signature:
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:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Rightway Fasteners
Source Address: 7945 S. International Drive, Columbus, Indiana 47201
MSOP Permit No.: M005-29850-00048

□ Natural Gas Only □ Alternate Fuel burned From:_____ To:_____

I certify that, based on information and belief formed after reasonable inquiry, the statements information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Phone:
Date:

Appendix A: Emissions Calculations
Summary

Company Name: Rightway Fasteners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
Permit Number: M005-30934-00048
Plt ID: 005-00048
Reviewer: Sarah Germann
Date: 9/26/2011

	Uncontrolled Potential To Emit (ton/yr)										
Process / Emission Unit	**PM**	**PM_{10}***	**PM2.5**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP**	**Single HAP Name**	**Combination HAPs**	**GHGs as CO2e****
Geomet 720 LV (A-Line)	-	-	-	-	-	5.39	-	1.89	Methanol	1.89	-
Geomet 720 LV (B-Line)	-	-	-	-	-	5.39	-	1.89	Methanol	1.89	-
Geomet 720 LV (D-Line)	-	-	-	-	-	5.39	-	1.89	Methanol	1.89	-
Geomet 720 LV (E-Line)	-	-	-	-	-	5.39	-	1.89	Methanol	1.89	-
Neotorquer (topcoater)	-	-	-	-	-	0.43	-	-	-	-	-
Neotorquer B-2 (C-Line)	-	-	-	-	-	0.43	-	-	-	-	-
Dacro Ovens (combustion)	0.05	0.19	0.19	0.02	2.54	0.14	2.14	0.05	Hexane	0.05	3,071
Heat Treating (HA-01)	0.09	0.09	-	0.01	1.15	0.06	0.93	0.03	Hexane	0.03	2,076
Heat Treating (HA-02)	0.09	0.09	-	0.01	1.15	0.06	0.93	0.03	Hexane	0.03	2,076
Heat Treating (HA-03)	0.08	0.08	-	0.01	1.10	0.06	0.93	0.02	Hexane	0.03	1,458
Heat Treating (HA-04)	0.09	0.09	-	0.01	1.15	0.06	0.93	0.03	Hexane	0.03	2,076
Heat Treating (HTA-01)	2.29	2.29	-	0.00	0.16	0.01	0.13	0.003	Hexane	0.002	190
Heat Treating (HA-05)	0.03	0.12	0.12	0.01	1.53	0.08	1.29	0.03	Hexane	0.03	1,850
Boiler	0.01	0.05	0.05	0.004	0.66	0.04	0.55	0.01	Hexane	0.01	793
Zinc Plating	7.71	7.71	-	-	-	-		0.0002	Chromium	0.0002	-
Totals:	**10.43**	**10.70**	**0.36**	**0.06**	**9.43**	**22.92**	**7.83**	**1.89**	Methanol	**7.75**	**13,591**

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

**The 100,000 CO_2e 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.

Appendix A: Emissions Calculations
VOC, Particulate, and HAPs from Surface Coating Operations

Company Name: Rightway Fasteners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
Permit Number: M005-30934-00048
Plt ID: 005-00048
Reviewer: Sarah Germann
Date: 9/26/2011

The tables below contain the calculations provided by Rightway Fasteners, Inc. for MSOP 005-18698-00048. IDEM has reviewed these calculations and verified their accuracy.

Material	Density (Lb/Gal)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Geomet 720 LV (A-Line)	11.4	0.95	3.20	1.30	1.23	29.51	5.39	0.00	6.10	100%
Geomet 720 LV (B-Line)	11.4	0.95	3.20	1.30	1.23	29.51	5.39	0.00	6.10	100%
Neotorquer B-2 (C-Line)	8.6	0.46	1.05	0.21	0.10	2.34	0.43	0.00	1.24	100%
Geomet 720 LV (D-Line)	11.4	0.95	3.50	1.30	1.23	29.51	5.39	0.00	6.10	100%
Geomet 720 LV (E-Line)	11.4	0.95	3.50	1.30	1.23	29.51	5.39	0.00	6.10	100%
Neotorquer (topcoater)	8.6	0.46	1.05	0.21	0.10	2.34	0.43	0.00	1.63	100%

State Potential Emissions (VOCs and Particulate) (Worst Case)	**5.11**	**122.72**	**22.40**	**0.00**

Material	Density (Lb/Gal)	Gallons of Material (gal/hr)	Weight % Methanol	Methanol Emissions (ton/yr)
Geomet 720 LV (A-Line)	11.4	0.95	4.0%	1.89
Geomet 720 LV (B-Line)	11.4	0.95	4.0%	1.89
Neotorquer B-2 (C-Line)	8.6	0.46	0%	0
Geomet 720 LV (D-Line)	11.4	0.95	4.0%	1.89
Geomet 720 LV (E-Line)	11.4	0.95	4.0%	1.89
Neotorquer (topcoater)	8.6	0.46	0%	0

State Potential Emissions (HAPs) (Worst Case)	**7.55**

METHODOLOGY
"Pounds VOC per gallon of coating less water", "Pounds VOC per gallon of coating" and "Pounds VOC per Gallon of Solids" supplied by vendor
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/hr) x (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/hr) x (8760 hr/yr) x (1 ton/2000 lbs)
Zinc and chromic acid are not atomized in the coating process
HAPS emission rate (tons/yr) = Density (lb/gal) x Gal of Material (gal/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC, Particulate, and HAPs from Surface Coating Operations
Coating Emissions Summary

Company Name: Rightway Fasteners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
Permit Number: M005-30934-00048
Plt ID: 005-00048
Reviewer: Sarah Germann
Date: 9/26/2011

The tables below contain the calculations provided by Rightway Fasteners, Inc. for MSOP 005-18698-00048. IDEM has reviewed these calculations and verified their accuracy.
Reference part: M10 x 1.25, 88 mm L

		A-Line	B-Line	C-Line	D-Line	E-Line	Original Topcoater
Coating:		**Geomet 720 LV**	**Geomet 720 LV**	**Neotorquer B-2**	**Geomet 720 LV**	**Geomet 720 LV**	**Neotorquer B-2**
Anticipated start date:		12/17/07	10/1/08	11/1/94	2/15/08	1/2/08	10/1/93
Parameter	**Units**						
part weight	g	62	62	62	62	62	62
weight/basket	lb	160	160	110	160	160	110
pc/basket		1,169	1,169	804	1,169	1,169	804
prdn rate	baskets/hr	17	17	20	17	17	20
pc/hr		19,873	19,873	16,080	19,873	19,873	16,080
target dry coating wt	$mg/(dm)^2$	250	250	50	250	250	50
part surface area	dm^2	0.4390	0.4390	0.4390	0.4390	0.4390	0.4390
dry coating wt/pc	mg	110	110	22	110	110	22
dry coating needed	g/hr	2186	2186	354	2186	2186	354
	lb/hr	4.8	4.8	0.8	4.8	4.8	0.8
Coating characteristics:							
Coating sp gr		1.365	1.365	1.03	1.365	1.365	1.03
Total volatiles (water & VOC)	by volume	79%	79%	83%	79%	79%	83%
VOC content	lb/gal incl water	1.3	1.3	0.21	1.3	1.3	0.21
	lb/gal less water						
VOC density	lb/gal VOC	6.69	6.69	6.69	6.69	6.69	6.69
water content	by weight	44%	44%	78%	44%	44%	78%
	lb/gal ctg	5.01	5.01	6.66	5.01	5.01	6.66
soilds density	lb/gal solids	24.2	24.2	10.0	24.2	24.2	10.0
coating solids content	lb/gal ctg	5.08	5.08	1.72	5.08	5.08	1.72
coating liquid needed assuming no density change	gal ctg/hr	0.95	0.95	0.46	0.95	0.95	0.46
VOC Emissions							
	lb VOC/hr	1.2	1.2	0.10	1.2	1.2	0.10
	lb VOC/day	30	30	2	30	30	2
	tons VOC/yr	5.4	5.4	0.4	5.4	5.4	0.4
Hazardous Air Pollutant (HAP) Emissions							
Coating used	lb ctg/hr	10.8	10.8	4.0	10.8	10.8	4.0
HAP content	% by weight	4%	4%	0%	4%	4%	0%
	lb HAP/hr	0.43	0.43	0	0.43	0.43	0
	lb HAP/day	10.3	10.3	0	10.3	10.3	0
	tons HAP/yr	1.9	1.9	0	1.9	1.9	0

Appendix A: Emissions Calculations
Dacro Coating Ovens
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Rightway Fasteners, Inc.**
Address City IN Zip: **7945 S. International Dr., Columbus, IN 47201**
Permit Number: **M005-30934-00048**
Plt ID: **005-00048**
Reviewer: **Sarah Germann**

Date: **9/26/2011**

Coating Ovens Combustion Units	Heat input capacity (MMBTU/hr)
A-Line	0.794
B-Line	0.794
Topcoater	0.265
C-Line	0.780
D-Line	1.389
D-Line dryer	0.397
E-Line	1.389
Total	**5.807**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
5.8	1000	50.9

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.05	0.19	0.19	0.02	2.54	0.14	2.14

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, 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 following page for HAPs emissions calculations.

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

Company Name: Rightway Fasteners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
Permit Number: M005-30934-00048
Plt ID: 005-00048
Reviewer: Sarah Germann
Date: 9/26/2011

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.341E-05	3.052E-05	1.908E-03	4.578E-02	8.648E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.272E-05	2.798E-05	3.561E-05	9.665E-06	5.341E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See following page for Greenhouse Gas calculations.

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

Company Name: **Rightway Fasteners, Inc.**
Address City IN Zip: **7945 S. International Dr., Columbus, IN 47201**
Permit Number: **M005-30934-00048**
Plt ID: **005-00048**
Reviewer: **Sarah Germann**
Date: **9/26/2011**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	3,052	0.1	0.1
Summed Potential Emissions in tons/yr	3,052		
CO2e Total in tons/yr	3,071		

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).

Appendix A: Emissions Calculations
Heat Treating Emissions Estimate

Company Name: Rightway Fasteners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
Permit Number: M005-30934-00048
Plt ID: 005-00048
Reviewer: Sarah Germann
Date: 9/26/2011

The tables below contain the calculations provided by Rightway Fasteners, Inc. for MSOP 005-18698-00048. IDEM has reviewed these calculations and verified their accuracy.

		Emission Factor	HA-01	HA-02	HA-03	HA-04	HTA-01
			2,200	*2,200*	*550*	*2,200*	*730*
			ton/hr	*ton/hr*	*ton/hr*	*ton/hr*	*ton/hr*
			Tons/yr	**Tons/yr**	**Tons/yr**	**Tons/yr**	**Tons/yr**
Capacity	*MMBtu/hr*	lb/MMBtu					
Hardening	NO_X	0.1	0.7731	0.7731	0.4520	0.7731	
	SO_2	0.00058824	0.0045	0.0045	0.0027	0.0045	
	CO	0.084	0.6494	0.6494	0.3797	0.6494	
	PM	0.0076	0.0588	0.0588	0.0344	0.0588	
	VOC	0.0055	0.0425	0.0425	0.0249	0.0425	
Capacity	*MMBtu/hr*	lb/MMBtu					
Tempering	NO_X	0.1	0.5729	0.5729	0.6517	0.5729	0.1572
	SO_2	0.00058824	0.0034	0.0034	0.0038	0.0034	0.0009
	CO	0.084	0.4812	0.4812	0.5475	0.4812	0.1321
	PM	0.0076	0.0435	0.0435	0.0495	0.0435	0.0120
	VOC	0.0055	0.0315	0.0315	0.0358	0.0315	0.0086
Capacity	*MMBtu/hr*	lb/MMBtu					
Smoke killer	NO_X	0.094	0.0844	0.0844	0.0490	0.0844	
	SO_2	0.00058824	0.0005	0.0005	0.0003	0.0005	
	CO	0.044	0.0395	0.0395	0.0229	0.0395	
	PM	0.0076	0.0068	0.0068	0.0040	0.0068	
	VOC	0.0055	0.0049	0.0049	0.0029	0.0049	
Capacity	*MMBtu/hr*	lb/MMBtu					
Gas generator	NO_X	0.1	0.2838	0.2838	0.0490	0.2838	
	SO_2	0.00058824	0.0017	0.0017	0.0003	0.0017	
	CO	0.084	0.2384	0.2384	0.0229	0.2384	
	PM	0.0076	0.0216	0.0216	0.0040	0.0216	
	VOC	0.0055	0.0156	0.0156	0.0029	0.0156	
Air agitation PM							2.27

Appendix A: Emissions Calculations
Heat Treating Emissions Estimate

Company Name: Rightway Fasteners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
Permit Number: M005-30934-00048
Plt ID: 005-00048
Reviewer: Sarah Germann
Date: 9/26/2011

The tables below contain the calculations provided by Rightway Fasteners, Inc. for MSOP 005-18698-00048. IDEM has reviewed these calculations and verified their accuracy.

Totals for each Heat Treatment Line

		Potential t/yr
HA-01	NO_X	1.15
	SO_2	0.007
	CO	0.93
	PM	0.09
	VOC	0.06

HA-02	NO_X	1.15
	SO_2	0.007
	CO	0.93
	PM	0.09
	VOC	0.06

HA-03	NO_X	1.10
	SO_2	0.006
	CO	0.93
	PM	0.08
	VOC	0.06

HA-04	NO_X	1.15
	SO_2	0.007
	CO	0.93
	PM	0.09
	VOC	0.06

HTA-01	NO_X	0.16
	SO_2	0.0009
	CO	0.13
	PM	2.286
	VOC	0.009

		Potential t/yr
Totals (HA-01, HA-02, HA-03, HA-04, HTA-01)	NO_X	4.70
	SO_2	0.03
	CO	3.85
	PM	2.63
	VOC	0.26

Source - Chapter 1.4, AP-42, 5th Ed., Supplement D (7/98)

Appendix A: Emissions Calculations
Heat Treating Emissions Estimate: HAPs

Company Name: Rightway Fasteners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
Permit Number: M005-30934-00048
Plt ID: 005-00048
Reviewer: Sarah Germann
Date: 9/26/2011

	HAPs - Organics					HAPs - Metals				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMcf)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03

Heat Treatment Line	Maximum Capacity (tons/hr steel	Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMcf/yr)	HAPs Potential Emissions (tons per year)									
					Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel
HA-01	2200	hardening	1.765	15.46	1.6E-05	9.3E-06	5.8E-04	1.4E-02	2.6E-05	3.9E-06	8.5E-06	1.1E-05	2.9E-06	1.6E-05
		tempering	1.308	11.46	1.2E-05	6.9E-06	4.3E-04	1.0E-02	1.9E-05	2.9E-06	6.3E-06	8.0E-06	2.2E-06	1.2E-05
		smoke killer	0.205	1.80	1.9E-06	1.1E-06	6.7E-05	1.6E-03	3.1E-06	4.5E-07	9.9E-07	1.3E-06	3.4E-07	1.9E-06
		gas gen	0.648	5.68	6.0E-06	3.4E-06	2.1E-04	5.1E-03	9.7E-06	1.4E-06	3.1E-06	4.0E-06	1.1E-06	6.0E-06
HA-02	2200	hardening	1.765	15.46	1.6E-05	9.3E-06	5.8E-04	1.4E-02	2.6E-05	3.9E-06	8.5E-06	1.1E-05	2.9E-06	1.6E-05
		tempering	1.308	11.46	1.2E-05	6.9E-06	4.3E-04	1.0E-02	1.9E-05	2.9E-06	6.3E-06	8.0E-06	2.2E-06	1.2E-05
		smoke killer	0.205	1.80	1.9E-06	1.1E-06	6.7E-05	1.6E-03	3.1E-06	4.5E-07	9.9E-07	1.3E-06	3.4E-07	1.9E-06
		gas gen	0.648	5.68	6.0E-06	3.4E-06	2.1E-04	5.1E-03	9.7E-06	1.4E-06	3.1E-06	4.0E-06	1.1E-06	6.0E-06
HA-03	550	hardening	1.032	9.04	9.5E-06	5.4E-06	3.4E-04	8.1E-03	1.5E-05	2.3E-06	5.0E-06	6.3E-06	1.7E-06	9.5E-06
		tempering	1.488	13.03	1.4E-05	7.8E-06	4.9E-04	1.2E-02	2.2E-05	3.3E-06	7.2E-06	9.1E-06	2.5E-06	1.4E-05
		smoke killer	0.119	1.04	1.1E-06	6.3E-07	3.9E-05	9.4E-04	1.8E-06	2.6E-07	5.7E-07	7.3E-07	2.0E-07	1.1E-06
		gas gen	0.119	1.04	1.1E-06	6.3E-07	3.9E-05	9.4E-04	1.8E-06	2.6E-07	5.7E-07	7.3E-07	2.0E-07	1.1E-06
HA-04	2200	hardening	1.765	15.46	1.6E-05	9.3E-06	5.8E-04	1.4E-02	2.6E-05	3.9E-06	8.5E-06	1.1E-05	2.9E-06	1.6E-05
		tempering	1.308	11.46	1.2E-05	6.9E-06	4.3E-04	1.0E-02	1.9E-05	2.9E-06	6.3E-06	8.0E-06	2.2E-06	1.2E-05
		smoke killer	0.205	1.80	1.9E-06	1.1E-06	6.7E-05	1.6E-03	3.1E-06	4.5E-07	9.9E-07	1.3E-06	3.4E-07	1.9E-06
		gas gen	0.648	5.68	6.0E-06	3.4E-06	2.1E-04	5.1E-03	9.7E-06	1.4E-06	3.1E-06	4.0E-06	1.1E-06	6.0E-06
HTA-01	730	tempering	0.359	3.14	3.3E-06	1.9E-06	1.2E-04	2.8E-03	5.3E-06	7.9E-07	1.7E-06	2.2E-06	6.0E-07	3.3E-06
				TOTALS	**1.4E-04**	**7.8E-05**	**4.9E-03**	**1.2E-01**	**2.2E-04**	**3.3E-05**	**7.2E-05**	**9.1E-05**	**2.5E-05**	**1.4E-04**
					Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See following page for Greenhouse Gas calculations.

Appendix A: Emissions Calculations
Heat Treating Emissions Estimate: Greenhouse Gases

Company Name: Rightway Fasteners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
Permit Number: M005-30934-00048
Plt ID: 005-00048
Reviewer: Sarah Germann
Date: 9/26/2011

	CO2	CH4	N20
Emission Factor (lb/MMcf)	120,000	2.3	2.2

Emissions Unit	tons/hr steel fasteners (max capacity)		Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMcf/yr)	Greenhouse Gases Potential Emissions (tons per year)		
HA-01	2200	hardening	1.765	15.46	928	0.02	0.02
		tempering	1.308	11.46	687	0.01	0.01
		smoke killer	0.205	1.80	108	0.00	0.00
		gas gen	0.648	5.68	341	0.01	0.01
HA-02	2200	hardening	1.765	15.46	928	0.02	0.02
		tempering	1.308	11.46	687	0.01	0.01
		smoke killer	0.205	1.80	108	0.00	0.00
		gas gen	0.648	5.68	341	0.01	0.01
HA-03	550	hardening	1.032	9.04	542	0.01	0.01
		tempering	1.488	13.03	782	0.01	0.01
		smoke killer	0.119	1.04	63	0.00	0.00
		gas gen	0.119	1.04	63	0.00	0.00
HA-04	2200	hardening	1.765	15.46	928	0.02	0.02
		tempering	1.308	11.46	687	0.01	0.01
		smoke killer	0.205	1.80	108	0.00	0.00
		gas gen	0.648	5.68	341	0.01	0.01
HTA-01	730	tempering	0.359	3.14	189	0.00	0.00
				Potential Emission in tons/yr	**7,829**	**0.15**	**0.14**
				Summed Potential Emissions in tons/yr	**7,829**		
				CO2e Total in tons/yr	**7,876**		

Line	CO2	CH4	N20	CO2e
HA-01	2,064	0.04	0.04	2,076
HA-02	2,064	0.04	0.04	2,076
HA-03	1,450	0.03	0.03	1,458
HA-04	2,064	0.04	0.04	2,076
HTA-01	189	0.00	0.00	190
				7,876

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).

Appendix A: Emissions Calculations
Heat Treatment Line HA-05
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Rightway Fasteners, Inc.**
Address City IN Zip: **7945 S. International Dr., Columbus, IN 47201**
Permit Number: **M005-30934-00048**
Plt ID: **005-00048**

Reviewer: **Sarah Germann**

Date: **9/26/2011**

HA-05 Unit	Heat Input Capacity (MMBtu/hr)
HA-05 prewash heater	0.20
HA-05 hardening furnace	1.71
HA-05 gas generator	0.12
HA-05 smoke killer	0.20
HA-05 tempering furnace	1.27
Total	3.50

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
3.5	1000	30.7

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.03	0.12	0.12	0.01	1.53	0.08	1.29

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, 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 following page for HAPs emissions calculations.

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

Company Name: Rightway Fasteners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
Permit Number: M005-30934-00048
Plt ID: 005-00048
Reviewer: Sarah Germann
Date: 9/26/2011

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.218E-05	1.839E-05	1.149E-03	2.759E-02	5.211E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	7.663E-06	1.686E-05	2.146E-05	5.824E-06	3.218E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See following page for Greenhouse Gas calculations.

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

Company Name: **Rightway Fasteners, Inc.**
Address City IN Zip: **7945 S. International Dr., Columbus, IN 47201**
Permit Number: **M005-30934-00048**
Plt ID: **005-00048**
Reviewer: **Sarah Germann**
Date: **9/26/2011**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,839	0.0	0.0
Summed Potential Emissions in tons/yr	1,839		
CO2e Total in tons/yr	1,850		

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).

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

Company Name: **Rightway Fasteners, Inc.**
Address City IN Zip: **7945 S. International Dr., Columbus, IN 47201**
Permit Number: **M005-30934-00048**
Plt ID: **005-00048**
Reviewer: **Sarah Germann**
Date: **9/26/2011**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
1.5	1000	13.1

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.01	0.05	0.05	0.00	0.66	0.04	0.55

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, 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 following page for HAPs emissions calculations.

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

Company Name: Rightway Fasteners, Inc.
Address City IN Zip: 7945 S. International Dr., Columbus, IN 47201
Permit Number: M005-30934-00048
Plt ID: 005-00048
Reviewer: Sarah Germann
Date: 9/26/2011

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.380E-05	7.884E-06	4.928E-04	1.183E-02	2.234E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.285E-06	7.227E-06	9.198E-06	2.497E-06	1.380E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See following page for Greenhouse Gas calculations.

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

Company Name: **Rightway Fasteners, Inc.**
Address City IN Zip: **7945 S. International Dr., Columbus, IN 47201**
Permit Number: **M005-30934-00048**
Plt ID: **005-00048**
Reviewer: **Sarah Germann**
Date: **9/26/2011**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	788	0.0	0.0
Summed Potential Emissions in tons/yr	788		
CO2e Total in tons/yr	793		

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).

Appendix A: Emissions Calculations
Zinc Plating Emissions

Company Name: **Rightway Fasteners, Inc.**
Address City IN Zip: **7945 S. International Dr., Columbus, IN 47201**
Permit Number: **M005-30934-00048**
Plt ID: **005-00048**
Reviewer: **Sarah Germann**
Date: **9/26/2011**

The tables below contain the calculations provided by Rightway Fasteners, Inc. for MSOP 005 18698-00048. IDEM has reviewed these calculations and verified their accuracy.

Plating PM	1 Degr	0.02	0.0876
	2 Degr	0.04	0.1752
	Pickling	0.07	0.3066
	1 Ac EC	0.23	1.0074
	2 Ac EC	0.23	1.0074
	Alk EC	0.12	0.5256
	Plating	1.05	4.599

Chromate PM	0.0001	0.000438
HAP PM	0.00005	0.000219

Total PM	1.76	7.71

HCl tank	0.02	0.08

Maximum Capacity:

Line Speed	Loading	Total
barrels/hr	*lb/barrel*	*lb/hr*
30	110	3,300

	Potential		**HAP PTE**
	lb/hr	**Tons/yr**	**Tons/yr**
Alkaline scrubber	1.23	5.3874	
Acid scrubber	0.53	2.3214	
Chromate scrubber	0.0001	0.000438	0.000219
		7.71	

Emissions from the Zinc Plating Boiler are included in the previous page (Natural Gas Combustion Only: Boiler)

Appendix A: Emissions Calculations
Shotblasting Operations

Company Name: **Rightway Fasteners, Inc.**
Address City IN Zip: **7945 S. International Dr., Columbus, IN 47201**
Permit Number: **M005-30934-00048**
Plt ID: **005-00048**
Reviewer: **Sarah Germann**
Date: **9/26/2011**

The tables below contain the operation information provided by Rightway Fasteners, Inc. for MSOP 005-18698-00048.

Unit ID	Manufacturer	Media	Model & S/N	Work Capacity (lb/hr)	Year installed	Stack ID & diameter (in)	Exhaust flow rate (acfm)	Exhaust conditions
SBA-01	Sampoh	steel shot	T-155 S/N 98750	1,920	1991	H (7 in)	800	Ambient
SBA-02	Pangborn	steel shot	6GN5R S/N 6GN-5R/S-930098	1,920	1993	G (6 in)	700	Ambient
SBA-03	Sintobrator	steel shot	CND10B S/N 4-325722	960	1997	F (8 in)	350	Ambient
SBA-04	Sampoh	sand	TA-67 S/N 98372	480	2003	B (12 in)	350	Ambient
SBA-05	Pangborn	steel shot	6GN-2R36 S/N 6GN-2R36/S040119	1,920	2001	D (6 in)	1,000	Ambient
SBA-06	Pangborn	steel shot	3GN-2R36 S/N 3GN-2R36/S050189	360	2005	I (4 in)	700	Ambient
SBA-07	Wheelabrator	steel shot	SLB 3.0 S/N 3311	960	2006	E (6 in)	1,765	Ambient
SBA-08	Pangborn	steel shot	6GN-2R S/N 6GN-2R/S040147	1,920	2008 (not in use, 7/17/08)	C (6 in)	1,000	Ambient
SBA-09	Unknown	steel shot	Unknown	300	1993	A (6 in)	350 (est)	Ambient

Totals:	10,740

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: Doug Logan
Rightway Fasteners, Inc
7945 S. International Dr
Columbus, IN 47201

DATE: October 14, 2011

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

SUBJECT: Final Decision
Notice-Only Change
005-30934-00048

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:
Yuta Takashima (President)
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.

Mail Code 61-53

IDEM Staff	MIDENNEY 10/14/2011 Rightway Fasteners, Inc 005-30934-00048 (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		Doug Logan Rightway Fasteners, Inc 7945 S International Dr Columbus IN 47201 (Source CAATS) via confirm delivery									
2		Yuta Takashima President Rightway Fasteners, Inc 7945 S International Dr Columbus IN 47201 *(RO CAATS)*									
3		Columbus City Council and Mayors Office 123 Washington St Columbus IN 47201 *(Local Official)*									
4		Mr. Elbert Held 734 Hutchins Columbus IN 47201 *(Affected Party)*									
5		Mr. Boris Ladwig 333 2nd St Columbus IN 47201 *(Affected Party)*									
6		Eileen Booher 1316 Chestnut St. Columbus IN 47201 *(Affected Party)*									
7		Mr. Lcnfc 1039 Sycamore St Columbus IN 47201 *(Affected Party)*									
8		Bartholomew County Commissioners 440 Third Street Columbus IN 47202 *(Local Official)*									
9		Mr. Jean Terpstra 3210 Grove Pkwy Columbus IN 47203 *(Affected Party)*									
10		August Tindell 31 Reo Street Columbus IN 47201 *(Affected Party)*									
11		Terry Lowe 1039 W Jeffersons St Apt 3 Franklin IN 46131 *(Affected Party)*									
12		Mr. Charles Mitch 3210 Grove Parkway Columbus IN 47203 *(Affected Party)*									
13		Bartholomew County Health Department 440 3rd Street, Suite 303 Columbus IN 47201 (Health Department)									
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
12			

FACSIMILIE OF PS Form 3877