INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 15, 2012

RE: Delta Tool Manufacturing, Inc./049-31074-00035

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07

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Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Delta Tool Manufacturing, Inc.
3201 Wabash Avenue
Rochester, Indiana 46975

(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.: M049-31074-00035	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 15, 2012 Expiration Date: March 15, 2022

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 tooling and metal blasting and coating manufacturing operation.

Source Address:	3201 Wabash Avenue, Rochester, Indiana 46975
General Source Phone Number:	574-223-2503
SIC Code:	3498 (Fabricated Pipe and Pipe Fittings)
County Location:	Fulton
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) One (1) surface coating booth, identified as SC, constructed prior to 1985, using HVLP spray applicators to coat metal parts, equipped with dry filters for particulate control, exhausting to Stack SC, capacity: 0.10 metal parts per hour.

(b) One (1) shotblast booth, identified as SB, constructed prior to 1985, equipped with a cyclone dust collector, identified as BH1, constructed in 2011, exhausting to the general ventilation, capacity: 160 pounds of metal parts per hour.

(c) Nine (9) metal inert gas (MIG) welding stations, identified as WD1 through WD9, constructed prior to 1985, exhausting to the general ventilation, capacity: 0.60 pounds of weld wire per hour, each.

(d) One (1) spot welding station, identified as WD10, constructed in 1985, exhausting to the general ventilation, capacity: 150 pounds of metal parts per hour.

(e) One (1) stick welding station, identified as WD11, constructed in 1985, exhausting to the general ventilation, capacity: 0.10 pounds of electrode consumed per hour.

(f) Natural gas-fired combustion sources, consisting of the following:

(1) Two (2) natural gas-fired forced air space heaters, identified as H1 and H2, constructed prior to 1985, exhausting to Stacks H1 and H2, heat input capacity: 0.200 million British thermal units per hour, each.

(2) One (1) natural gas-fired forced air space heater, identified as H3, constructed prior to 1985, exhausting to Stack H3, heat input capacity: 0.400 million British thermal units per hour.

(3) One (1) natural gas-fired forced air space heater, identified as H4, constructed prior to 1985, exhausting to Stack H4, heat input capacity: 0.100 million British thermal units per hour.

(4) One (1) natural gas-fired forced air space heater, identified as H5, constructed prior to 1985, exhausting to Stack H5, heat input capacity: 0.500 million British thermal units per hour.

(5) One (1) natural gas-fired forced air space heater, identified as H6, constructed prior to 1985, exhausting to Stack H6, heat input capacity: 0.100 million British thermal units per hour.

(6) One (1) natural gas-fired forced air space heater, identified as H7, constructed prior to 1985, exhausting to Stack H7, heat input capacity: 0.150 million British thermal units per hour.

(7) One (1) natural gas-fired forced air space heater, identified as H8, constructed prior to 1985, exhausting to Stack H8, heat input capacity: 0.200 million British thermal units per hour.

(8) One (1) natural gas-fired forced air space heater, identified as H9, constructed prior to 1985, exhausting to Stack H9, heat input capacity: 0.300 million British thermal units per hour.

(9) One (1) natural gas-fired water heater, identified as WH1, constructed prior to 1985, exhausting to the general ventilation, heat input capacity: 0.040 million British thermal units per hour.

(h) Miscellaneous metal fabrication equipment, identified as MMF, constructed in 1985, consisting of the following:

(1) Three (3) shearing tools, identified as SR1 through SR3,

(2) Four (4) band saws, identified as BS1 through BS4,

(3) One (1) plasma cutter, identified as PC1, cutting a maximum metal thickness of 0.179 inches with a maximum cutting rate of 10.0 inches per minute,

(4) One (1) arc carbon cutter, identified as CC1, cutting a maximum metal thickness of 0.179 inches with a maximum cutting rate of 10.0 inches per minute,

(5) Three (3) presses, identified as PP1 through PP3,

(6) Two (2) iron workers, identified as IW1 and IW2,

(7) One (1) radial drill, identified as DR1,

(8) Four (4) forming brakes, identified as BK1 through BK4,

(9) One (1) power roll, identified as PR1,

(10) One (1) hand roll, identified as HR1,

(11) Three (3) lathes, identified as LT1 through LT3,

(12) Two (2) vertical mills, identified as VM1 and VM2,

(13) Two (2) surface grinders, identified as SFG1 and SFG2,

(14) Three (3) drill presses, identified as DP1 through DP3,

(15) One (1) tapping unit, identified as TU1, and

(16) Eight (8) stamping presses, identified as PP4 through PP11.

(i) Paved and unpaved roads and parking lots with public access.

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, M049-31074-00035, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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.

(c) 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.

(d) 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 M049-31074-00035 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) 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 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Surface Coating Booth

(a) One (1) surface coating booth, identified as SC, constructed prior to 1985, using HVLP spray applicators to coat metal parts, equipped with dry filters for particulate control, exhausting to Stack SC, capacity: 0.10 metal parts per hour.

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

Emission Limitations and Standards

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

(a) Particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

(c) If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the dry particulate filter for particulate control shall be in operation and control emissions from the one (1) surface coating booth, identified as SC, at all times that the surface coating booth is in operation.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Metal Working Facilities

(b) One (1) shot blast booth, identified as SB constructed prior to 1985, equipped with a cyclone dust collector, identified as BH1, constructed in 2011, exhausting to the general ventilation, capacity: 160 pounds of metal parts per hour.

(c) Nine (9) metal inert gas (MIG) welding stations, identified as WD1 through WD9, constructed prior to 1985, exhausting to the general ventilation, capacity: 0.60 pounds of weld wire per hour, each.

(d) One (1) spot welding station, identified as WD10, constructed in 1985, exhausting to the general ventilation, capacity: 150 pounds of metal parts per hour.

(e) One (1) stick welding station, identified as WD11, constructed in 1985, exhausting to the general ventilation, capacity: 0.10 pounds of electrode consumed per hour.

(f) Natural gas-fired combustion sources, consisting of the following:

(1) Two (2) natural gas-fired forced air space heaters, identified as H1 and H2, constructed prior to 1985, exhausting to Stacks H1 and H2, heat input capacity: 0.200 million British thermal units per hour, each.

(2) One (1) natural gas-fired forced air space heater, identified as H3, constructed prior to 1985, exhausting to Stack H3, heat input capacity: 0.400 million British thermal units per hour.

(3) One (1) natural gas-fired forced air space heater, identified as H4, constructed prior to 1985, exhausting to Stack H4, heat input capacity: 0.100 million British thermal units per hour.

(4) One (1) natural gas-fired forced air space heater, identified as H5, constructed prior to 1985, exhausting to Stack H5, heat input capacity: 0.500 million British thermal units per hour.

(5) One (1) natural gas-fired forced air space heater, identified as H6, constructed prior to 1985, exhausting to Stack H6, heat input capacity: 0.100 million British thermal units per hour.

(6) One (1) natural gas-fired forced air space heater, identified as H7, constructed prior to 1985, exhausting to Stack H7, heat input capacity: 0.150 million British thermal units per hour.

(7) One (1) natural gas-fired forced air space heater, identified as H8, constructed prior to 1985, exhausting to Stack H8, heat input capacity: 0.200 million British thermal units per hour.

(8) One (1) natural gas-fired forced air space heater, identified as H9, constructed prior to 1985, exhausting to Stack H9, heat input capacity: 0.300 million British thermal units per hour.

(9) One (1) natural gas-fired water heater, identified as WH1, constructed prior to 1985, exhausting to the general ventilation, heat input capacity: 0.040 million British thermal units per hour.

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

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the one (1) shot blast booth, identified as SB, which has a process weight rate of 1,398 pounds per hour (where the metal parts weigh 160 pounds per hour and the blast media weighs 1, 238 pounds per hour), shall not exceed 3.22 pounds per hour.

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the shot blast booth, identified as SB, and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.3 Particulate Control

(a) In order to determine the compliance status with Condition D.1.1, the cyclone dust collection system for particulate control shall be in operation and control emissions from the one (1) shot blast booth, identified as SB, at all times that the shot blast booth is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ, of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.4 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone associated with the one (1) shot blast booth, identified as SB, when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

D.2.5 Cyclone Failure Detection

(a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.6 Record Keeping Requirements

(a) To document the compliance status with Condition D. 2.4, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.10.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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:	Delta Tool Manufacturing, Inc.
Address:	3201 Wabash Avenue
City:	Rochester, Indiana 46975
Phone #:	574-223-2503
MSOP #:	M049-31074-00035

I hereby certify that Delta Tool Manufacturing, Inc. is:
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Delta Tool Manufacturing, Inc. is:
- ☐ in compliance with the requirements of MSOP M049-31074-00035.
- ☐ not in compliance with the requirements of MSOP M049-31074-00035.

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

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	**Delta Tool Manufacturing, Inc.**
Source Location:	**3201 Wabash Avenue, Rochester, IN 46975**
County:	**Fulton**
SIC Code:	**3498 (Fabricated Pipe and Pipe Fittings)**
Permit Renewal No.:	**M049-31074-00035**
Permit Reviewer:	**Deborah Cole**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Delta Tool Manufacturing, Inc. relating to the operation of a stationary metal tooling and metal blasting and coating manufacturing operation. On October 27, 2011, Delta Tool Manufacturing, Inc. submitted an application to the OAQ requesting to renew its operating permit. Delta Tool Manufacturing, Inc. was issued a New Construction MSOP (M049-23769-00035) on March 5, 2007.

Permitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

(a) One (1) surface coating booth, identified as SC, constructed prior to 1985, using HVLP spray applicators to coat metal parts, equipped with dry filters for particulate control, exhausting to Stack SC, capacity: 0.10 metal parts per hour.

(b) One (1) shotblast booth, identified as SB, constructed prior to 1985, equipped with a cyclone dust collector, identified as BH1, constructed in 2011, exhausting to the general ventilation, capacity: 160 pounds of metal parts per hour.

(c) Nine (9) metal inert gas (MIG) welding stations, identified as WD1 through WD9, constructed prior to 1985, exhausting to the general ventilation, capacity: 0.60 pounds of weld wire per hour, each.

(d) One (1) spot welding station, identified as WD10, constructed in 1985, exhausting to the general ventilation, capacity: 150 pounds of metal parts per hour.

(e) One (1) stick welding station, identified as WD11, constructed in 1985, exhausting to the general ventilation, capacity: 0.10 pounds of electrode consumed per hour.

(f) Natural gas-fired combustion sources, consisting of the following:

(1) Two (2) natural gas-fired forced air space heaters, identified as H1 and H2, constructed prior to 1985, exhausting to Stacks H1 and H2, heat input capacity: 0.200 million British thermal units per hour, each.

(2) One (1) natural gas-fired forced air space heater, identified as H3, constructed prior to 1985, exhausting to Stack H3, heat input capacity: 0.400 million British thermal units per hour.

(3) One (1) natural gas-fired forced air space heater, identified as H4, constructed prior to 1985, exhausting to Stack H4, heat input capacity: 0.100 million British thermal units per hour.

(4) One (1) natural gas-fired forced air space heater, identified as H5, constructed prior to 1985, exhausting to Stack H5, heat input capacity: 0.500 million British thermal units per hour.

(5) One (1) natural gas-fired forced air space heater, identified as H6, constructed prior to 1985, exhausting to Stack H6, heat input capacity: 0.100 million British thermal units per hour.

(6) One (1) natural gas-fired forced air space heater, identified as H7, constructed prior to 1985, exhausting to Stack H7, heat input capacity: 0.150 million British thermal units per hour.

(7) One (1) natural gas-fired forced air space heater, identified as H8, constructed prior to 1985, exhausting to Stack H8, heat input capacity: 0.200 million British thermal units per hour.

(8) One (1) natural gas-fired forced air space heater, identified as H9, constructed prior to 1985, exhausting to Stack H9, heat input capacity: 0.300 million British thermal units per hour.

(9) One (1) natural gas-fired water heater, identified as WH1, constructed prior to 1985, exhausting to the general ventilation, heat input capacity: 0.040 million British thermal units per hour.

(g) Miscellaneous metal fabrication equipment, identified as MMF, constructed in 1985, consisting of the following:

(1) Three (3) shearing tools, identified as SR1 through SR3,

(2) Four (4) band saws, identified as BS1 through BS4,

(3) One (1) plasma cutter, identified as PC1, cutting a maximum metal thickness of 0.179 inches with a maximum cutting rate of 10.0 inches per minute,

(4) One (1) arc carbon cutter, identified as CC1, cutting a maximum metal thickness of 0.179 inches with a maximum cutting rate of 10.0 inches per minute,

(5) Three (3) presses, identified as PP1 through PP3,

(6) Two (2) iron workers, identified as IW1 and IW2,

(7) One (1) radial drill, identified as DR1,

(8) Four (4) forming brakes, identified as BK1 through BK4,

(9) One (1) power roll, identified as PR1,

(10) One (1) hand roll, identified as HR1,

(11) Three (3) lathes, identified as LT1 through LT3,

(12) Two (2) vertical mills, identified as VM1 and VM2,

(13) Two (2) surface grinders, identified as SFG1 and SFG2,

(14) Three (3) drill presses, identified as DP1 through DP3,

(15) One (1) tapping unit, identified as TU1, and

(16) Eight (8) stamping presses, identified as PP4 through PP11.

(h) Paved and unpaved roads and parking lots with public access.

Existing Approvals

Since the issuance of the MSOP (049-23769-00035) on March 5, 2007, the source has had no additional approvals.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Fulton County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
Fulton County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air

pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	50.70
PM_{10}	49.94
$PM_{2.5}$	49.94
SO_2	0.006
NO_x	0.96
VOC	2.74
CO	0.81
GHGs as CO_2e	1,158.07
Single HAP	0.62 (xylene)
Total HAP	1.00

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants, excluding GHGs, is less than 100 tons per year. However, PM, PM10 and PM2.5 is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Shotblast (SB)/ Cyclone Dust Collector (BH1)	43.14	43.17	43.17	0	0	0	0	0	0	0
Surface Coating Booth (SC)	2.32	2.32	2.32	0	0	2.68	0	0	0.931	0.620 (xylene)
MIG Welding (WD1-WD9)	0.130	0.130	0.130	0	0	0	0	0	0.012	0.012 (manganese)
Spot Welder (WD10)	1.81	1.81	1.81	0	0	0	0	0	0.038	0.038 (manganese)
Stick Welding (WD11)	0.009	0.009	0.009	0	0	0	0	0	0	0
Natural Gas Combustion	0.018	0.073	0.073	0.006	0.959	0.053	0.806	1,158.07	0.017	0.017 (hexane)
Misc. Metal Manufacturing (MM)	2.15	2.15	2.15	0	0	0	0	0	0	0
Unpaved Roads	1.09	0.28	0.28	0	0	0	0	0	0	0
Total PTE of Entire Source	**50.70**	**49.94**	**49.94**	**0.006**	**0.96**	**2.74**	**0.81**	**1,158.07**	**1.0**	
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO_2e	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.

PSD

(a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

New Source Performance Standards (NSPS)

(a) The nine (9) natural gas-fired forced air space heaters, identified as H1 through H9, are not steam generating units. Therefore, the requirements of the New Source Performance Standards, 40 CFR 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, and Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.

(b) The one (1) natural gas-fired water heater, identified as WH1, has a heat input capacity of 0.040 million British thermal units per hour, which is less than 250 million British thermal units per hour. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, are not included in the permit.

(c) The one (1) natural gas-fired water heater, identified as WH1, has a heat input capacity of 0.040 million British thermal units per hour, which is less than 250 million British thermal units per hour. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, are not included in the permit.

(d) The one (1) natural gas-fired water heater, identified as WH1, has a heat input capacity of 0.040 million British thermal units per hour, which is less than 100 million British thermal units per hour. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.

(e) The one (1) natural gas-fired water heater, identified as WH1, was constructed before June 9, 1989. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.

(f) There are no other New Source Performance Standards included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(g) The source is an area source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, are not included in the permit.

(h) The source is an area source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, are not included in the permit.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40CFR Part 63, Subpart HHHHHH) are not included in the permit because the source does not do any the following: paint stripping operations of any kind; auto body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface

coating operations and do not use coatings which contain any of the target HAPs (chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)).

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63.11514, Subpart XXXXXX) are not included in this permit because the source is not primarily engaged in one of the source categories (SIC codes) listed.

(k) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) included in the permit for this source.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO_2e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)

This source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) because it will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in the 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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 8-1-6 (New facilities; general reduction requirements)

None of the facilities at the source have potential VOC emissions greater than twenty-five (25.0) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

State Rule Applicability – Shot Blaster and Baghouse

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)

(a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the one (1) shot blast booth, identified as SB, which has a process weight rate of 1,398 pounds per hour (where the metal parts weigh 160 pounds per hour and the blast media weighs 1, 238 pounds per hour), shall not exceed 3.22 pounds per hour.

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

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

The one (1) shot blast booth, identified as SB, is controlled by a cyclone dust collector, identified as BH1. The dust collector shall be in operation at all times the one (1) shot blast booth, identified as SB, is in operation in order to comply with this limit.

State Rule Applicability – Surface Coating

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

(a) Particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The one (1) surface coating booth, identified as SC, which was constructed after January 1, 1980, has potential VOC emissions of less than twenty-five (25.0) tons per year. Therefore, pursuant to

326 IAC 8-2-1(a)(2), the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating, are not applicable.

State Rule Applicability – Welding and Plasma Cutting

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(9) (Particulate Emission Limitations for Manufacturing Processes), the nine (9) metal inert gas (MIG) welding stations, identified as WD1 through WD9 and the one (1) stick welding station, identified as WD11, consume less than 625 pounds of weld wire or rod per day, total. Therefore, the requirements of 326 IAC 6-3-1 are not applicable.

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(9) (Particulate Emission Limitations for Manufacturing Processes), the one (1) plasma cutter, identified as PC, and the one (1) arc carbon cutter, identified as CC1, consume less than 3,400 inches per hour of stock 1-inch thickness or less. Therefore, the requirements of 326 IAC 6-3-1 are not applicable.

326 IAC 6-3-2 (Particulate Emissions Limitations; Work Practices and Control Technologies)

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations; Work Practices and Control Technologies) the potential particulate emissions from the following units are all less than 0.551 pounds per hour:

1. one (1) sport welding station, identified as WD10
2. three (3) lathes, identified as LT1-LT3
3. two (2) surfaces grinders, identified as SFG1 and SFG2
4. four (4) band saws, identified as BS1-BS4
5. two (2) vertical mills, identified as VM1 and VM2
6. one (1) radial drill, identified as DR1,
7. three (3)drill presses, identified as DP1-DP3

Therefore, pursuant to 326 IAC 6-3-1(b)(14) requirements of 326 IAC 6-3-2 do not apply to these units.

State Rule Applicability – Natural Gas Combustion

(a) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired heaters are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.

(b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired combustion units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

(c) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas-fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.

(d) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The natural gas-fired combustion units are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limits for the source under 326 IAC 9-1-2.

(e) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas-fired combustion units are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

Compliance Determination and Monitoring Requirements

The compliance monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Parameter	Frequency	Range	Excursions and Exceedances
Shot Blast Booth/BH1 Cyclone Dust Controller	Inspection	Quarterly	Normal-Abnormal	Response Steps
Surface Coating Booth/ dry filters	Filter Check	Once per day	Normal-Abnormal	Response Steps

These monitoring conditions are necessary because the cyclone dust collector for the shot blast booth, identified as SB, and the dry filters for the surface coating booth, identified as SC, must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-6.1 (MSOP).

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 27, 2011. Additional information was received on January 10 and 11, 2012.

Conclusion

The operation of this stationary metal tooling and metal blasting and coating manufacturing operation shall be subject to the conditions of the attached MSOP Renewal No. 049-31074-00035.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations

Company Name: Delta Tool Manufacturing, Inc.
Address City IN Zip: 3201 Wabash Avenue, Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Prepared By: Deborah Cole
Date 1/10/2011

Uncontrolled Potential Emissions

Significant Emissions Units	**PM**	**PM-10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**GHG**	**Lead**	**Ethyl Benzene**	**Toluene**	**Xylene**	**Benzene**	**Dichloro-benzene**	**Formal-dehyde**	**Hexane**	**Chromium**	**Cadmium**	**Manganese**	**Nickel**	**Total HAPs**
	(tons/yr)	(tons/yr)		(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)		(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
One (1) Shotblast(SB)/ Cyclone Dust Collector(BH1)	43.17	43.17	43.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) surface coating booth, identified as SC	2.32	2.32	2.32	0.00	0.00	2.68	0.00	0.00	0.00	0.110	0.201	0.620	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.931
Nine (9) MIG welding stations, identified as WD1 through WD 9	0.130	0.130	0.130	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.012	0.00	0.012
One (1) spot welder, identified as WD10	1.81	1.81	1.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.038	0.00	0.038
One (1) stick welding station, identified as WD11	0.009	0.009	0.009	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0000	0.00	0.0000
Natural gas-fired combustion	0.018	0.073	0.073	0.006	0.959	0.053	0.806	1,158.07	0.000005	0.00	0.00003	0.00	0.00002	0.00001	0.001	0.017	0.00001	0.00001	0.000004	0.00002	0.018
Miscellaneous Metal Manufacturing, including:																					
Flame Cutting	0.176	0.176	0.176	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Shaping/Grinding	1.09	1.09	1.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cutting	0.493	0.493	0.493	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drilling	0.398	0.398	0.398	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unpaved Roads	1.09	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**50.70**	**49.94**	**49.94**	**0.006**	**0.96**	**2.74**	**0.81**	**1,158.07**	**0.0**	**0.1**	**0.2**	**0.62**	**0.00002**	**0.00001**	**0.00072**	**0.01727**	**0.00001**	**0.00001**	**0.049**	**0.00002**	**1.00**

Company Name: Delta Tool Manufacturing, Co.
Address City IN Zip: 3201 Wabash Ave., Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Prepared By: Deborah Cole
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Controlled Potential Emissions

Significant Emissions Units	**PM**	**PM-10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**GHG**	**Lead**	**Ethyl Benzene**	**Toluene**	**Xylene**	**Benzene**	**Dichloro-benzene**	**Formal-dehyde**	**Hexane**	**Chromium**	**Cadmium**	**Manganese**	**Nickel**	**Total HAPs**
	(tons/yr)	(tons/yr)		(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)		(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
One (1) Shotblast(SB)/ Cyclone Dust Collector(BH1)	0.43	0.43	0.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) surface coating booth, identified as SC	0.485	0.485	0.485	0.00	0.00	2.68	0.00	0.00	0.00	0.110	0.201	0.620	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.931
Nine (9) MIG welding stations, identified as WD1 through WD 9	0.130	0.130	0.130	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.012	0.00	0.012
One (1) spot welder, identified as WD10	1.81	1.81	1.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.038	0.00	0.038
One (1) stick welding station, identified as WD11	0.009	0.009	0.009	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0000	0.00	0.0000
Natural gas-fired combustion	0.018	0.073	0.073	0.006	0.959	0.053	0.806	1,158.07	0.000005	0.00	0.00003	0.00	0.00002	0.00001	0.001	0.017	0.00001	0.00001	0.00	0.00002	0.018
Miscellaneous Metal Manufacturing, including:																					
Flame Cutting	0.176	0.176	0.176	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Shaping/Grinding	1.086	1.086	1.086	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cutting	0.493	0.493	0.493	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drilling	0.398	0.398	0.398	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unpaved Roads	1.09	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**6.1**	**5.37**	**5.37**	**0.006**	**0.959**	**2.74**	**0.806**	**1,158.07**	**0.000005**	**0.110**	**0.201**	**0.620**	**0.00002**	**0.00001**	**0.001**	**0.017**	**0.00001**	**0.00001**	**0.049**	**0.00002**	**1.00**

Company Name: Delta Tool Manufacturing, Inc.
Address City IN Zip: 3201 Wabash Avenue, Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Reviewer: Deborah Cole
Application Date: 1/10/2011

Limited Potential to Emit

Significant Emissions Units	**PM**	**PM-10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**GHG**	**Lead**	**Ethyl Benzene**	**Toluene**	**Xylene**	**Benzene**	**Dichloro-benzene**	**Formal-dehyde**	**Hexane**	**Chromium**	**Cadmium**	**Manganese**	**Nickel**	**Total HAPs**
	(tons/yr)	(tons/yr)		(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)		(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
One (1) Shotblast(SB)/ Cyclone Dust Collector(BH1)	0.43	0.43	0.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) surface coating booth, identified as SC	0.485	0.485	0.485	0.000	0.000	2.68	0.000	0.000	0.000	0.110	0.201	0.620	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.931
Nine (9) MIG welding stations, identified as WD1 through WD 9	0.130	0.130	0.130	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.012	0.00	0.012
One (1) spot welder, identified as WD10	1.81	1.81	1.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.038	0.00	0.038
One (1) stick welding station, identified as WD11	0.009	0.009	0.009	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0000	0.000	0.0000
Natural gas-fired combustion	0.018	0.073	0.073	0.006	0.959	0.053	0.806	1,158.07	0.000005	0.00	0.00003	0.00	0.00002	0.00001	0.001	0.017	0.00001	0.00001	0.000004	0.00002	0.018
Miscellaneous Metal Manufacturing, including:																					
Flame Cutting	0.176	0.176	0.176	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Shaping/Grinding	1.09	1.09	1.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cutting	0.493	0.493	0.493	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drilling	0.398	0.398	0.398	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unpaved Roads	1.09	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**6.1**	**5.37**	**5.37**	**0.006**	**0.959**	**2.74**	**0.806**	**1,158.07**	**0.000005**	**0.110**	**0.201**	**0.620**	**0.00002**	**0.00001**	**0.001**	**0.017**	**0.00001**	**0.00001**	**0.049**	**0.00002**	**1.00**

Appendix A : Emission Calculation
Shotblast Booth Baghouse

Company Name: **Delta Tool Manufacturing, Inc.**
Address City IN Zip: **3201 Wabash Avenue, Rochester, IN 46975**
MSOP: **049-31074-00035**
Plt ID: **049-00035**
Prepared By **Deborah Cole**
Date **January 10, 2012**

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
Shotblast booth/BH1	99.0%	0.001	11500.0	9.9	43.2	0.099	0.432
			TOTALS	**9.9**	**43.2**	**0.1**	**0.4**

Methodology
Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
160	0.080	0.75

Methodology
Allowable Emissions = 4.10(Process Weight Rate)^0.67

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

Company Name: Delta Tool Manufacturing, Inc.
Address City IN Zip: 3201 Wabash Avenue, Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Prepared By Deborah Cole
Date January 10, 2012

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
One (1) surface coating booth, identified as SC																
E61A280 Gray Epoxy Primer	14.1	16.8%	0.00%	16.8%	0.00%	68.0%	1.68	0.100	2.38	2.38	0.400	9.59	1.75	2.16	3.50	75%
V66V282 Epoxy Primer Catalyst	7.44	54.2%	0.00%	54.2%	0.00%	41.0%	0.420	0.100	4.03	4.03	0.169	4.06	0.741	0.157	9.83	75%
										Sub-total	**0.569**	**13.7**	**2.49**	**2.32**		
OR																
E61YC49 Epoxy Yellow Primer	14.0	18.2%	0.00%	18.2%	0.00%	70.0%	0.840	0.100	2.54	2.54	0.213	5.12	0.934	1.05	3.63	75%
V66V282 Epoxy Primer Catalyst	7.44	54.2%	0.00%	54.2%	0.00%	41.0%	0.210	0.100	4.03	4.03	0.085	2.03	0.371	0.078	9.83	75%
										Sub-total	**0.298**	**7.15**	**1.30**	**1.13**		
OR																
F63YC23 Caterpillar Yellow	9.81	27.4%	0.00%	27.4%	0.00%	61.0%	0.230	0.100	2.69	2.69	0.062	1.48	0.271	0.179	4.41	75%
V66V55 HS Plus Catalyst	9.34	9.96%	0.00%	10.0%	0.00%	88.0%	0.080	0.100	0.930	0.930	0.007	0.179	0.033	0.074	1.06	75%
										Sub-total	**0.069**	**1.66**	**0.304**	**0.253**		
OR																
G74YC165 Caterpillar Yellow	8.08	56.9%	0.00%	56.9%	0.00%	39.0%	0.230	0.100	4.60	4.60	0.106	2.54	0.463	0.088	11.8	75%
										Sub-total	**0.106**	**2.54**	**0.463**	**0.088**		
OR																
5439B30202 Caterpillar Black	11.1	50.0%	0.00%	50.0%	0.00%	25.9%	0.230	0.100	5.56	5.56	0.128	3.07	0.560	0.140	21.5	75%
										Sub-total	**0.128**	**3.07**	**0.560**	**0.140**		
OR																
E61RC21 Red Oxide	9.72	39.7%	0.00%	39.7%	0.00%	39.0%	0.230	0.100	3.86	3.86	0.089	2.13	0.389	0.148	9.90	75%
										Sub-total	**0.089**	**2.13**	**0.389**	**0.148**		
OR																
F77B2 Flat Black	8.89	59.4%	0.00%	59.4%	0.00%	27.0%	0.470	0.100	5.28	5.28	0.248	5.96	1.087	0.186	19.6	75%
										Sub-total	**0.248**	**5.96**	**1.09**	**0.186**		
AND																
Xylene solvent	7.18	100%	0.00%	100.0%	0.00%	0.00%	0.005	0.100	7.18	7.18	0.004	0.09	0.016	0.00	n/a	100%
Methyl Ethyl Ketone solvent	6.68	100%	0.00%	100.0%	0.00%	0.00%	0.040	0.100	6.68	6.68	0.027	0.64	0.117	0.00	n/a	100%
Methyl Amyl Ketone solvent	6.76	100%	0.00%	100.0%	0.00%	0.00%	0.020	0.100	6.76	6.76	0.014	0.32	0.059	0.00	n/a	100%
										Sub-total	**0.044**	**1.05**	**0.192**	**0.00**		
									PM Control Efficiency:	**79.1%**						
Add worst case coating to all solvents										**Uncontrolled**	**0.613**	**14.7**	**2.68**	**2.32**		
										Controlled	**0.613**	**14.7**	**2.68**	**0.485**		

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Delta Tool Manufacturing, Inc.
Address City IN Zip: 3201 Wabash Avenue, Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Prepared By Deborah Cole
Date January 10, 2012

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Isocyanate Compounds	Weight % MIBK	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Isocyanate Compounds Emissions (ton/yr)	MIBK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total Emissions (ton/yr)
One (1) surface coating booth, identified as SC														
E61A280 Gray Epoxy Primer	14.1	1.68	0.100	0.400%	0.00%	0.00%	0.00%	2.00%	0.042	0.00	0.00	0.00	0.208	0.250
V66V282 Epoxy Primer Catalyst	7.44	0.420	0.100	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
								Sub-total	**0.042**	**0.00**	**0.00**	**0.00**	**0.208**	**0.250**
OR														
E61YC49 Epoxy Yellow Primer	14.0	0.840	0.100	0.400%	0.00%	0.00%	0.00%	3.00%	0.021	0.00	0.00	0.00	0.154	0.175
V66V282 Epoxy Primer Catalyst	7.44	0.210	0.100	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
								Sub-total	**0.021**	**0.00**	**0.00**	**0.00**	**0.154**	**0.175**
OR														
F63YC23 Caterpillar Yellow	9.81	0.230	0.100	0.100%	0.00%	0.00%	4.00%	0.00%	0.001	0.000	0.00	0.040	0.00	0.041
V66V55 HS Plus Catalyst	9.34	0.080	0.100	0.00%	0.20%	0.00%	0.00%	0.00%	0.000	0.001	0.00	0.00	0.00	0.00
								Sub-total	**0.001**	**0.001**	**0.00**	**0.040**	**0.00**	**0.041**
OR														
G74YC165 Caterpillar Yellow	8.08	0.230	0.100	0.200%	0.00%	0.00%	6.00%	1.00%	0.002	0.00	0.00	0.049	0.008	0.059
								Sub-total	**0.002**	**0.00**	**0.00**	**0.049**	**0.008**	**0.059**
OR														
5439B30202 Caterpillar Black	11.1	0.230	0.100	5.00%	0.00%	10.00%	0.00%	10.00%	0.056	0.000	0.112	0.00	0.112	0.280
								Sub-total	**0.056**	**0.000**	**0.112**	**0.00**	**0.112**	**0.280**
OR														
E61RC21 Red Oxide	9.72	0.230	0.100	0.30%	0.00%	0.00%	0.00%	1.00%	0.003	0.00	0.00	0.00	0.010	0.013
								Sub-total	**0.003**	**0.00**	**0.00**	**0.00**	**0.010**	**0.013**
OR														
F77B2 Flat Black	8.89	0.470	0.100	6.00%	0.00%	0.00%	11.0%	33.0%	0.110	0.00	0.00	0.201	0.604	0.915
								Sub-total	**0.110**	**0.00**	**0.00**	**0.201**	**0.604**	**0.915**
AND														
Xylene solvent	7.18	0.005	0.100	0.00%	0.00%	0.00%	0.00%	100%	0.00	0.00	0.00	0.00	0.016	0.02
Methyl Ethyl Ketone solvent	6.68	0.040	0.100	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Methyl Amyl Ketone solvent	6.76	0.020	0.100	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
								Sub-total	**0.00**	**0.00**	**0.00**	**0.00**	**0.016**	**0.016**
								Worst Case	**0.110**	**0.001**	**0.112**	**0.201**	**0.620**	**0.931**

METHODOLOGY

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

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Delta Tool Manufacturing, Inc.
Address City IN Zip: 3201 Wabash Avenue, Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Prepared By Deborah Cole
Date January 10, 2012

PROCESS	Number of Stations	Max. electrode or carbon steel consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode or carbon steel)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(carbon steel)	9.00	0.600		0.0055	0.0005			0.030	0.003	0.000	0	0.003
Spot Welding	1.00	75.0		0.0055	0.0005			0.413	0.038	0.000	0	0.038
Stick (E7018 electrode)	1.00	0.100		0.0211	0.0009			0.002	0.000	0.000	0	0.0001
											0	
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	1.00	0.179	10.0	0.0039				0.002	0.000	0.000	0.000	0.00
Arc Carbon Cutter	1.00	0.179	10.0	0.0039				0.002	0.000	0.000	0.000	0.00
EMISSION TOTALS												
Potential Emissions lbs/hr								0.447	0.04	0.00	0.00	0.04
Potential Emissions lbs/day								10.7	0.967	0.00	0.00	0.967
Potential Emissions tons/year								1.96	0.176	0.00	0.00	0.18

METHODOLOGY

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

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

An equivalence of carbon steel to pounds of weld wire consumed was assumed for spot welding. Also, a conservative assumption was made that half of the process weight rate of the welding activities (75 lbs carbon steel) is the worst case going through the spot welder.

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

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

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

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

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

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

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

Company Name: Delta Tool Manufacturing, Inc.
Address City IN Zip: 3201 Wabash Avenue, Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Prepared By Deborah Cole
Date January 10, 2012

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
2.19	1000	19.2

	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	0.018	0.073	0.073	0.006	0.959	0.053	0.806

*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 page 2 for HAPs emissions calculations.

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

Company Name: Delta Tool Manufacturing, Inc.
Address City IN Zip: 3201 Wabash Avenue, Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Prepared By Deborah Cole
Date January 10, 2012

	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	0.00002	0.00001	0.00072	0.01727	0.00003

	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	0.000005	0.000011	0.000013	0.000004	0.000020

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 Page 3 for Greenhouse Gas calculations.

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

Company Name: Delta Tool Manufacturing, Inc.
Address City IN Zip: 3201 Wabash Avenue, Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Prepared By Deborah Cole
Date January 10, 2012

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,151	0.0	0.0
Summed Potential Emissions in tons/yr	1,151		
CO2e Total in tons/yr	1,158		

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
Miscellaneous Metal Fabrication

Company Name: Delta Tool Manufacturing, Inc.
Address City IN Zip: 3201 Wabash Avenue, Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Prepared By Deborah Cole
Date January 10, 2012

Shaping/Grinding

Process/Operation	Description	ID	Surface Thickness Removed (in)	Surface Width Removed (in)	Surface Distance (in/hr)	Material Loss (in^3/hr)	Material Density (lb/in^3)	Material Loss (lb/hr)
Machining/Tool/Die	Lathe	LT1	0.125	0.031	20.0	0.078	0.290	0.023
Machining/Tool/Die	Lathe	LT2	0.125	0.031	20.0	0.078	0.290	0.023
Machining/Tool/Die	Lathe	LT3	0.125	0.031	20.0	0.078	0.290	0.023
Machining/Tool/Die	Surface Grinder	SFG1	0.031	2.00	5.00	0.310	0.290	0.090
Machining/Tool/Die	Surface Grinder	SFG2	0.031	2.00	5.00	0.310	0.290	0.090
Estimated Emissions (lb/hr)								**0.248**
Estimated Emissions (tons/yr)								**1.09**

METHODOLOGY
Material Loss (in^3/hr) = Surface Thickness (in) X Surface Width (in) X Surface Distance (in/hr)
Material Density (lbs/in^3) = Data from O'Neal Steel, Inc. Stock List and Reference Book, 1999
Estimated Emissions (lb/hr) = Material Loss (in^3/hr) X Material Density (lb/in^3)
Estimated Emissions (tons/yr) = Material Loss (in^3/hr) X 8,760 (hrs/yr) X 1/2,000 (lbs/ton)

Cutting

Process/Operation	Description	ID	Material Thickness (in)	Cutting Surface Thickness (in)	Process rate (in/hr)	Material Loss (in^3/hr)	Material Density (lb/in^3)	Material Loss (lb/hr)
Shearing/Cutting	Vertical Bandsaw	BS1	0.179	0.031	10.0	0.055	0.290	0.016
Shearing/Cutting	Vertical Bandsaw	BS2	0.179	0.031	10.0	0.055	0.290	0.016
Shearing/Cutting	Horizontal Bandsaw	BS3	0.179	0.031	5.00	0.028	0.290	0.008
Shearing/Cutting	Horizontal Bandsaw	BS4	0.179	0.031	5.00	0.028	0.290	0.008
Machining/Tool/Die	Vertical Mill	VM1	0.179	0.031	20.0	0.111	0.290	0.032
Machining/Tool/Die	Vertical Mill	VM2	0.179	0.031	20.0	0.111	0.290	0.032
Estimated Emissions (lb/hr)								**0.113**
Estimated Emissions (tons/yr)								**0.493**

METHODOLOGY
Same as Shaping/Grinding Table

Drilling

Process/Operation	Description	ID	Material Thickness (in)	Drilling Area (in^2)	Drill rate (holes/hr)	Material Loss (in^3/hr)	Material Density (lb/in^3)	Material Loss (lb/hr)
Punching/Notching/Drilling	Radial Drill	DR1	0.179	0.200	5.00	0.179	0.290	0.052
Machining/Tool/Die	Drill Press	DP1	0.179	0.050	5.00	0.045	0.290	0.013
Machining/Tool/Die	Drill Press	DP2	0.179	0.050	5.00	0.045	0.290	0.013
Machining/Tool/Die	Drill Press	DP3	0.179	0.050	5.00	0.045	0.290	0.013
Estimated Emissions (lb/hr)								**0.091**
Estimated Emissions (tons/yr)								**0.398**

METHODOLOGY
Material Loss (in^3/hr) = Material Thickness (in) X Drilling Area (in^2) X Process rate (holes/hr)
Other equations the same as above.

TOTAL: **1.98**

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Delta Tool Manufacturing, Inc.
Address City IN Zip: 3201 Wabash Avenue, Rochester, IN 46975
MSOP: 049-31074-00035
Plt ID: 049-00035
Prepared By Deborah Cole
Date January 10, 2012

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one way distance (feet/trip)	Maximum one way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	1.0	1.0	1.0	1.0	10,000	1.894	1.9	691.3
Vehicle (leaving plant) (one-way trip)	1.0	1.0	1.0	1.0	1.0	10,000	1.894	1.9	691.3
		Total	**2.0**		**2.0**			**3.8**	**1382.6**

Average Vehicle Weight Per Trip = 1.0 tons/trip
Average Miles Per Trip = 1.89 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	1.0	1.0	1.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.57	0.40	0.40	lb/mile
Mitigated Emission Factor, Eext =	1.03	0.26	0.26	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.54	0.14	0.14	0.36	0.09	0.09	0.18	0.05	0.05
Vehicle (leaving plant) (one-way trip)	0.54	0.14	0.14	0.36	0.09	0.09	0.18	0.05	0.05
	1.09	**0.28**	**0.28**	**0.72**	**0.18**	**0.18**	**0.36**	**0.09**	**0.09**

Methodology

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

Abbreviations

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Dan Hartman
Delta Tool Manufacturing, Inc.
PO Box 241
Rochester, IN 46975

DATE: March 15, 2012

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

SUBJECT: Final Decision
Minor Source Operating Permit Renewal
049-31074-00035

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:
Nate Black, Consultant
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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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March 15, 2012

TO: Fulton County Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: **Delta Tool Manufacturing, Inc.**
Permit Number: **049-31074-00035**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	PWAY 3/15/2012 Delta Tool Manufacturing, Inc. 049-31074-00035 (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		Dan Hartman Delta Tool Manufacturing, Inc. PO Box 241 Rochester IN 46975 (Source CAATS)									
2		Nate Black D&B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 *(Consultant*									
3		Fulton County Commissioners 1093 E 600 N Rochester IN 46975 *(Local Official)*									
4		Fulton Co Public Library 320 W 7th St Rochester IN 46975-1332 *(Library)*									
5		Fulton County Health Department 125 E 9th Street #125 Rochester IN 46975-7119 *(Health Department)*									
6		Rochester City Council and Mayors Office 320 Main St Rochester IN 46975 *(Local Official)*									
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