



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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Indianapolis, Indiana 46204  
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[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: September 20, 2012

RE: Indiana Automotive Fasteners, Inc./059-31990-00024

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

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, 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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**Federally Enforceable State Operating Permit  
Renewal  
OFFICE OF AIR QUALITY**

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

(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.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F059-31990-00024	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 20, 2012 Expiration Date: September 20, 2022

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

## SECTION A SOURCE SUMMARY

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

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

---

The Permittee owns and operates a stationary automotive nuts and bolts manufacturing plant.

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

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

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

- (a) Sixty-one (61) head forming machines, four (4) nut forming machines, and six (6) nut tapping machines, collectively identified as EU-6, constructed between 1996 and 2007, each processing a maximum of 12,000 fasteners per hour (each fastener weighs 0.1 oz), each machine is controlled by its corresponding Smog Hog Electrostatic Precipitator, thirty-five (35) of the head forming machines exhausting to stacks V6:1-11 and the remaining machines exhausting within the building.
- (b) Dacrotizing Coating Line, identified as DSM, constructed in 1996, modified in 2009 and 2010, for the application of corrosion resistant coatings to ferrous-based metal fasteners, and consisting of:
  - (1) One (1) cleaner wash and natural gas fired dry-off oven (DSM), identified as EU-7, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V7A and V7B.
  - (2) Two (2) SBL shot blasters (DSM), identified as EU-8a and EU-8b, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
  - (3) One (1) dacrotizing metal treatment process (DSM), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V-9;
  - (4) One (1) natural gas fired dacrotizing oven, identified as EU-9a, constructed in 1996, rated at 1.0 MMBtu/hr, uncontrolled, and exhausting to stack V9;
  - (5) One (1) dacrotizing metal treatment process (DSM), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal

oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V9.

- (c) Dacrotizing Coating Line 1, identified as DS1, approved for construction in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
  - (1) One (1) dip coating operation (DS1), identified as EU-42, with a maximum throughput of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V42;
  - (2) One (1) natural gas-fired pre-cure oven (DS1), identified as EU-43, constructed in 2011, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), and exhausting through Stack V-44; and
  - (3) One (1) natural gas-fired curing oven, consisting of six (6) burners, each rated at 0.15 MMBtu/hr, constructed in 2011, collectively identified as EU-44, with a combined maximum heat input capacity of 0.90 MMBtu/hr, exhausting through Stacks V-43A and V-43B.
  
- (d) Dacrotizing Coating Line 2, identified as DS2, constructed in 2002, approved for modification in 2012 for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
  - (1) Two (2) SBL shot blasters (DS2), identified as EU-20a, and EU-20b, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;
  - (2) One (1) cleaner wash and natural gas fired dry-off oven (DS2), identified as EU-21, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V21-A and V21-B.
  - (3) One (1) dip coating operation (DS2), identified as EU-22, processing a maximum of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V22-A.
  - (4) One (1) natural gas fired dry-off oven (DS2), identified as EU-22b, rated at 0.7 MMBtu/hr, and exhausting to stack V22-B.
  
- (e) Dacrotizing Line 3, identified as DS3, constructed in 2009, approved for modification in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
  - (1) One (1) SBL shot blaster (DS3), identified as EU-37, with a combined maximum throughput of 343 Pounds of fasteners per hour and 560 lbs per hour of steel shot, controlled by cartridge filters, and exhausting inside the building.
  - (2) One (1) dip coating operation (DS3), identified as EU-38, with a maximum throughput of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V39;
  - (3) One (1) natural gas fired pre-cure oven (DS3), identified as EU-39, with one (1) burner rated at 0.14 MMBtu/hr, uncontrolled and exhausted through stack V39.

- (4) One (1) natural gas fired cure oven (DS3) with a cooling zone, identified as EU-40, with six (6) burners rated at 0.16 MMBtu/hr, each, uncontrolled and exhausted through stacks V40-A & V40-B.
  
- (f) One (1) thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, used as control for emission units: DSM, DS1, DS2 and DS3. Stacks V9 (DSM), V42 (DS1), V22A (DS2) and V39 (DS3) will vent emissions to a header and then to the thermal oxidizer (EU-47) and exhausting to stack V46.
  
- (g) One (1) top coating line, identified as (JC-06), consisting of the following:
  - (1) One (1) top coating operation, identified as EU-45, approved for construction in 2012, with a maximum potential throughput of 20,000 parts per hour, using no controls, and exhausting inside the building;
  - (2) One (1) natural gas-fired pre-cure oven, identified as EU-46, approved for construction in 2012, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), and exhausting through Stack V-44; and
  - (3) One (1) natural gas-fired curing oven, consisting of six (6) burners, each rated at 0.15 MMBtu/hr, approved for construction in 2012, collectively identified as EU-47, with a combined maximum heat input capacity of 0.90 MMBth/hr, exhausting through Stacks V-45a and V-45b.
  
- (h) Barrel Zinc Plating Line 1, identified as BZ1, constructed in 1996, for the application of zinc and chrome coatings to ferrous-based metal fasteners, and consisting of:
  - (1) One (1) electric zinc plating oven, identified as EU-10, uncontrolled, and exhausting to stack V10;
  - (2) One (1) zinc plating/ trivalent chromium treatment dip process, identified as EU-12, coating a maximum of 2,700 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V12;

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.
  
- (i) Barrel Zinc Plating Line 2, identified as BZ2, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the following:
  - (1) One (1) electric zinc plating oven, identified as EU-27, constructed in 1996, uncontrolled, and exhausting to stack V27;
  - (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-26, constructed in 2002, coating a maximum of 2,700 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V26;

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.
  
- (j) Barrel Zinc plating Line 3, identified as BZ3, constructed in 2009, for the application of zinc and chrome coatings to ferrous based metal fasteners, and including the following:

- (1) One (1) alkaline zinc plating and trivalent chromium treatment dip process, identified as EU-41, (no VOC's) coating a maximum of 3000 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V41.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

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

This stationary source also includes the following insignificant activities:

- (a) One (1) electric annealing oven (LAN), identified as EU-1, processing a maximum of 1,100 pounds of fasteners per hour, constructed in 1996, uncontrolled, and exhausting to stacks V1-A and V1-B;
- (b) One (1) electric bluing oven (AOQ) identified as EU-2, processing a maximum of 1,100 pounds of fasteners per hour, constructed in 1996, uncontrolled, and exhausting to stacks V2-A and V2-B;
- (c) Oil Quench Line 1 (OQ1), identified EU-3, constructed 1996, for the heat treatment of metal fasteners at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V24, V3, V4 & V5 and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu/hr;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) electric tempering furnace.
- (d) Four (4) natural gas fired boilers consisting of:
  - (1) EU-15, constructed in 1996, rated at 2.1 MMBtu/hr and exhausting to stacks V15; [326 IAC 6-2-4]
  - (2) EU-15-1, constructed in 1996, rated at 1.977 MMBtu/hr and exhausting to stacks V15-1; [326 IAC 6-2-4]
  - (3) EU-15-2, approved for construction in 2012, rated at 1.977 MMBtu/hr, and exhausting to stack V15-2; [326 IAC 6-2-4]
  - (4) EU-16, constructed in 1996, rated at 1.2 MMBtu/hr and exhausting to stack V16; [326 IAC 6-2-4]
- (e) Two (2) 7,000 gallon hydrochloric acid (HCL) storage tanks, identified as EU-18, constructed in 2007, controlled by the BZ2 scrubber, and exhausting to stack V26;
- (f) One (1) top coating line, identified as JC-03 using dip coating to apply VOC and HAP free coatings to metal fasteners, and consisting of:
  - (1) One (1) dip coating operation and natural gas fired dry-off oven, identified as EU-23, rated at 0.16 MMBtu/hr, processing a maximum of 700 pounds of

fasteners per hour, uncontrolled, and exhausting to stacks V23-A and V23-B.

- (g) Oil Quench Line 2 (OQ2), identified EU-25, constructed in 2002, for the heat treatment of metal fasteners, at a rate of 7,000lb/hr, uncontrolled, exhausting to stacks V24, V25-A, V25-B, V25-C & V25-D, and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu/hr;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) natural gas fired tempering furnace, rated at 0.16 MMBtu/hr.
  
- (h) Oil Quench Line 3 (OQ3), identified EU-29, for the heat treatment of metal fasteners, at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V28, V29-A, V29-B & V29-C, and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu/hr;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) natural gas fired tempering furnace, rated at 0.16MMBtu/hr.
  
- (i) Oil Quench Line 4 (OQ4), identified EU-31, for the heat treatment of metal fasteners at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V28, V31-A, V31-B & V31-C, and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) natural gas fired tempering furnace rated at 0.16MMBtu/hr.
  
- (j) Oil Quench Line 5 (OQ5), identified EU-33, for the heat treatment of metal fasteners, at a rate of 7000 lbs of fasteners/hr, uncontrolled, exhausting to stacks V32, V33-A, V33-B & V33-C, and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu/hr;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) natural gas fired tempering furnace, rated at 0.16 MMBtu/hr.
  
- (k) Lubricating Oil Quench Line (LOQ), identified as EU-34, for the heat treatment of metal fasteners, at a rate of 4800 per hour, uncontrolled, exhausting to stacks V34-A through V34-K, and consisting of:
  - (1) one (1) pre wash/dry unit,
  - (2) two (2) gas generators,
  - (3) four (4) natural gas-fired quenching furnaces, each rated at 0.34 MMBtu/hr,
  - (4) four (4) oil quenches,
  - (5) one (1) post wash/dry unit,
  - (6) two (2) natural gas-fired tempering furnaces, each rated at 0.18 MMBtu/hr;

- (7) four (4) electric tempering furnaces; and
  - (8) six (6) cooling chambers.
- (l) Oil Quench Line 6 (OQ6), identified EU-35, for the heat treatment of metal fasteners, at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V32, V35-A, V35-B & V35-C, and consisting of:
- (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu/hr;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) natural gas fired tempering furnace, rated at 0.16MMBtu/hr.
- (m) Two (2) electric annealing batch ovens (LAN), identified as EU-36a & EU-36b, constructed in 2007, uncontrolled, and exhausting to stacks V36-a & V36-b. Each unit has a maximum processing capacity of 3100 pounds of fasteners per day.

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

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

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, F059-31990-00024, 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]

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

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

### B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

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

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

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

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

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

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

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

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

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

- (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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.12 Emergency Provisions [326 IAC 2-8-12]**

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

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

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

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

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.13** Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F059-31990-00024 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
- (2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

---

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

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

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

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

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

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

**B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

#### **C.10 Performance Testing [326 IAC 3-6]**

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require

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

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

#### **C.12 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

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

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

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

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

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

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

#### **C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### **C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

#### **C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following:
  - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported

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

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### **Emissions Unit Description:** Head forming machines

- (a) Sixty-one (61) head forming machines, four (4) nut forming machines, and six (6) nut tapping machines, collectively identified as EU-6, constructed between 1996 and 2007, each processing a maximum of 12,000 fasteners per hour (each fastener weighs 0.1 oz), each machine is controlled by its corresponding Smog Hog Electrostatic Precipitator, thirty-five (35) of the head forming machines exhausting to stacks V6:1-11 and the remaining machines exhausting within the building.

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

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

#### **D.1.1 FESOP Limits: PM10, PM2.5 [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

- (a) The PM10 emissions from the 61 head forming machines, 4 nut forming machines and 6 nut tapping machines of EU-6 shall not exceed 0.241 pounds per hour, each.
- (b) The PM2.5 emissions from the 61 head forming machines, 4 nut forming machines and 6 nut tapping machines of EU-6 shall not exceed 0.241 pounds per hour, each.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5, to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits), not applicable.

#### **D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

### **Compliance Determination Requirements**

#### **D.1.3 Particulate Control**

In order to comply with Condition D.1.1 and to assure that each machine of EU-6 is exempted from 326 IAC 6-3, the electrostatic precipitators for particulate control shall be in operation and control emissions from each of the head and nut forming machines and nut tapping machines at all times that any of the head and nut forming machines and nut tapping machines are in operation.

#### **D.1.4 PM10 and PM2.5 Control**

In order to comply with Condition D.1.1, the Smog Hog Electrostatic Precipitator for PM10 and PM2.5 control shall be in operation and control emissions from the 61 head forming machines, four (4) nut forming machines, and six (6) nut tapping machines collectively identified as EU-6, are in operation.

## **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]**

### **D.1.5 Visible Emissions Notations**

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- (a) Visible emissions notations of the thirty-five (35) head forming machines exhausting to stacks V6:1-11 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

### **D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]**

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In order to demonstrate compliance with Condition D.1.4, the Permittee shall perform a one time test for PM10 and PM2.5 on one of the Electrostatic Precipitators (ESP) exhausting to a stack (V6:1-11), utilizing methods as approved by the Commissioner not later than one hundred and eighty (180) days after the issuance of this permit. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

## **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]**

### **D.1.7 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the thirty-five (35) head forming machines exhausting to stacks V6:1-11. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Dacrotizing Coating

- (b) Dacrotizing Coating Line, identified as DSM, constructed in 1996, modified in 2009 and 2010, for the application of corrosion resistant coatings to ferrous-based metal fasteners, and consisting of:
- (1) One (1) cleaner wash and natural gas fired dry-off oven (DSM), identified as EU-7, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V7A and V7B.
  - (2) Two (2) SBL shot blasters (DSM), identified as EU-8a and EU-8b, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
  - (3) One (1) dacrotizing metal treatment process (DSM), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V-9;
  - (4) One (1) natural gas fired dacrotizing oven, identified as EU-9a, constructed in 1996, rated at 1.0 MMBtu/hr, uncontrolled, and exhausting to stack V9;
  - (5) One (1) dacrotizing metal treatment process (DSM), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V9.
- (c) Dacrotizing Coating Line 1, identified as DS1, approved for construction in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
- (1) One (1) dip coating operation (DS1), identified as EU-42, with a maximum throughput of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V42;
  - (2) One (1) natural gas-fired pre-cure oven (DS1), identified as EU-43, constructed in 2011, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), and exhausting through Stack V-44; and
  - (3) One (1) natural gas-fired curing oven, consisting of six (6) burners, each rated at 0.15 MMBtu/hr, constructed in 2011, collectively identified as EU-44, with a combined maximum heat input capacity of 0.90 MMBtu/hr, exhausting through Stacks V-43A and V-43B.
- (d) Dacrotizing Coating Line 2, identified as DS2, constructed in 2002, approved for modification in 2012 for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
- (1) Two (2) SBL shot blasters (DS2), identified as EU-20a, and EU-20b, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;
  - (2) One (1) cleaner wash and natural gas fired dry-off oven (DS2), identified as EU-21, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V21-A and V21-B.

- (3) One (1) dip coating operation (DS2), identified as EU-22, processing a maximum of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V22-A.
- (4) One (1) natural gas fired dry-off oven (DS2), identified as EU-22b, rated at 0.7 MMBtu/hr, and exhausting to stack V22-B.
- (e) Dacrotizing Line 3, identified as DS3, constructed in 2009, approved for modification in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
  - (1) One (1) SBL shot blaster (DS3), identified as EU-37, with a combined maximum throughput of 343 Pounds of fasteners per hour and 560 lbs per hour of steel shot, controlled by cartridge filters, and exhausting inside the building.
  - (2) One (1) dip coating operation (DS3), identified as EU-38, with a maximum throughput of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V39;
  - (3) One (1) natural gas fired pre-cure oven (DS3), identified as EU-39, with one (1) burner rated at 0.14 MMBtu/hr, uncontrolled and exhausted through stack V39.
  - (4) One (1) natural gas fired cure oven (DS3) with a cooling zone, identified as EU-40, with six (6) burners rated at 0.16 MMBtu/hr, each, uncontrolled and exhausted through stacks V40-A & V40-B.
- (f) One (1) thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, used as control for emission units: DSM, DS1, DS2 and DS3. Stacks V9 (DSM), V42 (DS1), V22A (DS2) and V39 (DS3) will vent emissions to a header and then to the thermal oxidizer (EU-47) and exhausting to stack V46.
- (g) One (1) top coating line, identified as (JC-06), consisting of the following:
  - (1) One (1) top coating operation, identified as EU-45, approved for construction in 2012, with a maximum potential throughput of 20,000 parts per hour, using no controls, and exhausting inside the building;
  - (2) One (1) natural gas-fired pre-cure oven, identified as EU-46, approved for construction in 2012, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), and exhausting through Stack V-44; and
  - (3) One (1) natural gas-fired curing oven, consisting of six (6) burners, each rated at 0.15 MMBtu/hr, approved for construction in 2012, collectively identified as EU-47, with a combined maximum heat input capacity of 0.90 MMBth/hr, exhausting through Stacks V-45a and V-45b.

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

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

#### **D.2.1 PSD Minor Limits [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

Shotblaster ID	Control/Stack	PM Limit (lbs/hr)
SBL DSM (EU-8a)	Baghouse/V8	7.44
SBL DSM (EU-8b)	Baghouse/V8	7.44
SBL DS2 (EU-20a)	Baghouse/V20	7.44
SBL DS2 (EU-20b)	Baghouse/V20	7.44
SBL DS3 (EU-37)	Cartridge Filter	1.54

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**D.2.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [326 IAC 2(b)]**

(a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water from each of these emission units: DSM EU-9, DSM EU9b, DS2 EU-22, DS3 EU-38 and DS1 EU-42, as delivered to the applicator.

(b) When using non-compliant coatings, the Permittee shall comply with the following:

(1) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from emissions units DSM EU-9, DSM EU9b, DS2 EU-22, DS3 EU-39 and DS1 EU-42 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

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

Where:

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- D= Density of VOC in coating in pounds per gallon of VOC;
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

(2) The pounds of VOC per gallon of coating solids shall be limited to less 6.67.

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

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

Where:

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

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

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

The overall efficiency of the thermal oxidizer shall be greater than 65.64%.

**D.2.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]**

Pursuant to 326 IAC 8-2-9(f), when using solvents for clean-up at emission units EU-9, EU9b, EU-22, EU-38 and EU-42, work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

**D.2.4 Hazardous Air Pollutants (HAP) [326 IAC 2-4.1]**

The total HAP and manganese emissions from the five (5) shotblast units shall not exceed the following per twelve (12) consecutive month period:

Shotblaster ID	Control/Stack	Total HAPs Limit (tons/yr)	Manganese Limit (tons/yr)
SBL DSM (EU-8a)	Baghouse/V8	0.485	0.358
SBL DSM (EU-8b)	Baghouse/V8	0.485	0.358
SBL DS2 (EU-20a)	Baghouse/V20	0.485	0.358
SBL DS2 (EU-20b)	Baghouse/V20	0.485	0.358
SBL DS3 (EU-37)	Cartridge Filter	0.089	0.06

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

**D.2.5 Particulate [326 IAC 6-3-2]**

(Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Shotblaster ID	Control/Stack	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
SBL DSM (EU-8a)	Baghouse/V8	0.83	3.62
SBL DSM (EU-8b)	Baghouse/V8	0.83	3.62
SBL DS2 (EU-20a)	Baghouse/V20	0.47	2.47
SBL DS2 (EU-20b)	Baghouse/V20	0.47	2.47
SBL DS3 (EU-37)	Cartridge Filter	0.45	2.40

The pound per hour limitation was calculated with the following equation:

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

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

**D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

**Compliance Determination Requirements**

**D.2.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC content contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.2.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

Pursuant to 326 IAC 8-1-2(a) and to comply with Condition D.2.2, the Permittee shall operate the thermal oxidizer (EU-47) at all times.

**D.2.9 Particulate Control**

- (a) In order to comply with Conditions D.2.1, D.2.4 and D.2.5, the baghouses and cartridge filter for particulate control shall be in operation and control emissions from the shotblasters EU-8a, EU-8b, EU-20a, and EU-20b, are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also

include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**D.2.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]**

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- (a) In order to demonstrate compliance with Condition D.2.2, the Permittee shall perform VOC testing of the thermal oxidizer (EU-47), utilizing methods as approved by the Commissioner not later than sixty days after the installation of the last emission unit is connected to the thermal oxidizer or not later than May 31, 2013, whichever is earlier and then at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (b) In order to demonstrate compliance with Condition D.2.4, the Permittee shall perform a one time test for Manganese on one of the baghouses exhausting to stacks (V8, V20), utilizing methods as approved by the Commissioner not later than one hundred and eighty (180) days after the issuance of this permit. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

**Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]**

**D.2.11 Visible Emissions Notations**

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- (a) Visible emissions notations of the shot blasters stack exhausts (V8 and V20) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

**D.2.12 Thermal Oxidizer Temperature**

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average. From the date of startup until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of at least 1,400 degrees Fahrenheit.

- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.2, as approved by IDEM.
- (c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliance stack test.

#### D.2.13 Parametric Monitoring

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- (a) The Permittee shall record the pressure drop across each of the baghouses used in conjunction with each of the shotblasters (EU-8a, EU-8b, EU-20a and EU-20b), at least once per day when any of the shotblasters are in operation. When for any one reading, the pressure drop across each of the baghouses is outside the normal range, the Permittee shall take reasonable response steps. The normal range for this unit is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit. A pressure reading that is outside the above mentioned range is not a deviation from this permit.
- (b) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits established in the permit.
- (c) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

The instrument(s) used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

#### D.2.14 Broken or Failed Bag Detection

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

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

## **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]**

### **D.2.15 Record Keeping Requirements**

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- (a) To document the compliance status with conditions D.2.2 and D.2.7, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.2.2.
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on monthly basis:
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (3) The total VOC usage for each month.
  - (4) The monthly cleanup solvent usage.
- (b) To document the compliance status with Condition D.2.11, the Permittee shall maintain a daily record of visible emission notations of the shotblasters stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.2.12, the Permittee shall maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (d) To document the compliance status with Condition D.2.13(a), the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the shotblasters. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g., the process did not operate that day).
- (e) To document the compliance status with Conditions D.2.13(b) and (c), the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizer. The Permittee shall include in its daily record when the duct pressure or fan amperage is not taken and the reason for the lack of the reading (e.g. the process did not operate that day).
- (f) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description: Boilers**

- (d) Four (4) natural gas fired boilers consisting of:
- (1) EU-15, constructed in 1996, rated at 2.1 MMBtu/hr and exhausting to stacks V15; [326 IAC 6-2-4]
  - (2) EU-15-1, constructed in 1996, rated at 1.977 MMBtu/hr and exhausting to stacks V15-1; [326 IAC 6-2-4]
  - (3) EU-15-2, approved for construction in 2012, rated at 1.977 MMBtu/hr, and exhausting to stack V15-2; [326 IAC 6-2-4]
  - (4) EU-16, constructed in 1996, rated at 1.2 MMBtu/hr, and exhausting to stack V16; [326 IAC 6-2-4]

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

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

##### D.3.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from four (4) natural gas-fired boilers (EU-15, EU-15-1, 15-2 and EU-16), rated at 2.1, 1.977, 1.977 and 1.2 MMBtu/hr, respectively, shall not exceed 0.56 pounds per MMBtu heat input.

## SECTION E.1 FACILITY OPERATION CONDITIONS

### Emissions Unit Description: Plating and Polishing Operations

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

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

### National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [40 CFR 63]

#### E.1.1 General Provisions Relating to NESHAP Subpart WWWWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.460(b), the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, Appendix C of 40 CFR Part 63, Subpart WWWWWW in accordance with the schedule in 40 CFR 63 Subpart WWWWWW.

**E.1.2 NESHAP Subpart WWWWWW Requirements [40 CFR Part 63, Subpart WWWWWW]**

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The Permittee which operates a stationary plating and polishing source shall comply with the following provisions of 40 CFR Part 63, Subpart WWWWWW (included as Attachment A of this permit):

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

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

Source Name: Indiana Automotive Fasteners, Inc.  
Source Address: 1300 West Anderson Boulevard, Greenfield, Indiana 46140  
FESOP Permit No.: F059-31990-00024

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)\_\_\_\_\_
- Report (specify)\_\_\_\_\_
- Notification (specify)\_\_\_\_\_
- Affidavit (specify)\_\_\_\_\_
- Other (specify)\_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Indiana Automotive Fasteners, Inc.  
Source Address: 1300 West Anderson Boulevard, Greenfield, Indiana 46140  
FESOP Permit No.: F059-31990-00024

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

Page 2 of 2

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

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

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

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

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

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

Source Name: Indiana Automotive Fasteners, Inc.  
 Source Address: 1300 West Anderson Boulevard, Greenfield, Indiana 46140  
 FESOP Permit No.: F059-31990-00024

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

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

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

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

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

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

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

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

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

**Attachment A**

**Title 40: Protection of Environment**

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

## **Title 40: Protection of Environment**

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES  
(CONTINUED)

### **Subpart WWWW—National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations**

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

#### **Applicability and Compliance Dates**

#### **§ 63.11504 Am I subject to this subpart?**

(a) You are subject to this subpart if you own or operate a plating and polishing facility that is an area source of hazardous air pollutant (HAP) emissions and meets the criteria specified in paragraphs (a)(1) through (3) of this section.

(1) A plating and polishing facility is a plant site that is engaged in one or more of the processes listed in paragraphs (a)(1)(i) through (vi) of this section.

(i) Electroplating other than chromium electroplating (i.e., non-chromium electroplating).

(ii) Electroless or non-electrolytic plating.

(iii) Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying.

(iv) Dry mechanical polishing of finished metals and formed products after plating or thermal spraying.

(v) Electroforming.

(vi) Electropolishing.

(2) A plating or polishing facility is an area source of HAP emissions, where an area source is any stationary source or group of stationary sources within a contiguous area under common control that does not have the potential to emit any single HAP at a rate of 9.07 megagrams per year (Mg/yr) (10 tons per year (tpy)) or more and any combination of HAP at a rate of 22.68 Mg/yr (25 tpy) or more.

(3) Your plating and polishing facility uses or has emissions of compounds of one or more plating and polishing metal HAP, which means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, as defined in §63.11511, "What definitions apply to this subpart?" With the exception of lead, plating and polishing metal HAP also include any of these metals in the elemental form.

(b) [Reserved]

[73 FR 37741, July 1, 2008, as amended at 76 FR 57919, Sept. 19, 2011]

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

(a) This subpart applies to each new or existing affected source, as specified in paragraphs (a)(1) through (3) of this section, at all times. A new source is defined in §63.11511, "What definitions apply to this subpart?"

(1) Each tank that contains one or more of the plating and polishing metal HAP, as defined in §63.11511, "What definitions apply to this subpart?", and is used for non-chromium electroplating; electroforming; electropolishing; electroless plating or other non-electrolytic metal coating operations, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

(2) Each thermal spraying operation that applies one or more of the plating and polishing metal HAP, as defined in §63.11511, "What definitions apply to this subpart?"

(3) Each dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP, as defined in §63.11511, "What definitions apply to this subpart?"

(b) An affected source is existing if you commenced construction or reconstruction of the affected source on or before March 14, 2008.

(c) An affected source is new if you commenced construction or reconstruction of the affected source after March 14, 2008.

(d) This subpart does not apply to any of the process units or operations described in paragraphs (d)(1) through (6) of this section.

(1) Process units that are subject to the requirements of 40 CFR part 63, subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks).

(2) Research and development process units, as defined in §63.11511, "What definitions apply to this subpart?"

(3) Process units that are used strictly for educational purposes.

(4) Plating, polishing, coating, or thermal spraying conducted to repair surfaces or equipment.

(5) Dry mechanical polishing conducted to restore the original finish to a surface.

(6) Any plating or polishing process that uses process materials that contain cadmium, chromium, lead, or nickel (as the metal) in amounts less than 0.1 percent by weight, or that contain manganese in amounts less than 1.0 percent by weight (as the metal), as used. Information used to determine the amount of plating and polishing metal HAP in materials used in the plating or polishing process may include information reported on the Material Safety Data Sheet for the material, but is not required. For plating or polishing tanks, the HAP content may be determined from the final bath contents "as used" to plate or to polish.

(e) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, "Title V," provided you are not otherwise required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57919, Sept. 19, 2011]

### **§ 63.11506 What are my compliance dates?**

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart no later than July 1, 2010.

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

(c) If you own or operate a new affected source for which the initial startup date is after July 1, 2008, you must achieve compliance with the provisions of this subpart upon initial startup of your affected source.

### **Standards and Compliance Requirements**

#### **§ 63.11507 What are my standards and management practices?**

(a) If you own or operate an affected new or existing non-cyanide electroplating, electroforming, or electropolishing tank (hereafter referred to as an "electrolytic" process tank, as defined in §63.11511, "What definitions apply to this subpart?") that contains one or more of the plating and polishing metal HAP and operates at a pH of less than 12, you must comply with the requirements in paragraph (a)(1), (2), or (3) of this section, and implement the applicable management practices in paragraph (g) of this section, as practicable.

(1) You must use a wetting agent/fume suppressant in the bath of the affected tank, as defined in §63.11511, "What definitions apply to this subpart?" and according to paragraphs (a)(1)(i) through (iii) of this section.

(i) You must initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process.

(ii) You must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the bath, as in the original make-up of the bath, or in proportions such that the bath contents are returned to that of the original make-up of the bath.

(iii) If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressants to the tank to comply with this rule.

(2) You must capture and exhaust emissions from the affected tank to any one of the following emission control devices: composite mesh pad, packed bed scrubber, or mesh pad mist eliminator, according to paragraphs (a)(2)(i) and (ii) of this section.

(i) You must operate all capture and control devices according to the manufacturer's specifications and operating instructions.

(ii) You must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(3) You must cover the tank surface according to paragraph (a)(3)(i) or (ii) of this section.

(i) For batch electrolytic process tanks, as defined in §63.11511, "What definitions apply to this subpart?", you must use a tank cover, as defined in §63.11511, over all of the effective surface area of the tank for at least 95 percent of the electrolytic process operating time.

(ii) For continuous electrolytic process tanks, as defined in §63.11511, "What definitions apply to this subpart?", you must cover at least 75 percent of the surface of the tank, as defined in §63.11511, whenever the electrolytic process tank is in operation.

(b) If you own or operate an affected new or existing "flash" or short-term electroplating tank, as defined in §63.11511, "What definitions apply to this subpart?", that uses or emits one or more of the plating and polishing metal HAP, you must comply with the requirements specified in paragraph (b)(1) or (b)(2), and implement the applicable management practices in paragraph (g) of this section, as practicable.

(1) You must limit short-term or "flash" electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(2) You must use a tank cover, as defined in §63.11511, "What definitions apply to this subpart?", for at least 95 percent of the plating time.

(c) If you own or operate an affected new or existing process tank that is used both for short-term electroplating and for electrolytic processing of longer duration (i.e., processing that does not meet the definition of short-term or flash electroplating) and contains one or more of the plating and polishing metal HAP, you must meet the requirements specified in paragraph (a) or (b) of this section, whichever apply to the process operation, and implement the applicable management practices in paragraph (g) of this section, as practicable.

(d) If you own or operate an affected new or existing electroplating tank that uses cyanide in the plating bath, operates at pH greater than or equal to 12, and contains one or more of the plating and polishing metal HAP, you must comply with the requirements in paragraphs (d)(1) and (2) of this section:

(1) You must measure and record the pH of the bath upon startup of the bath, as defined in §63.11511, "What definitions apply to this subpart?" No additional pH measurements are required.

(2) You must implement the applicable management practices in paragraph (g) of this section, as practicable.

(e) If you own or operate an affected new or existing dry mechanical polishing machine that emits one or more of the plating and polishing metal HAP, you must operate a capture system that captures particulate matter (PM) emissions from the dry mechanical polishing process and transports the emissions to a cartridge, fabric, or high efficiency particulate air (HEPA) filter, according to paragraphs (e)(1) and (2) of this section.

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

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

### **§ 63.11508 What are my compliance requirements?**

(a) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with §63.11509(b) of "What are my notification, reporting, and recordkeeping requirements?"

(b) You must be in compliance with the applicable management practices and equipment standards in this subpart at all times.

(c) To demonstrate initial compliance, you must satisfy the requirements specified in paragraphs (c)(1) through (11) of this section.

(1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(1)(i) through (iv) of this section.

(i) You must add wetting agent/fume suppressant to the bath of each affected tank according to manufacturer's specifications and instructions.

(ii) You must state in your Notification of Compliance Status that you add wetting agent/fume suppressant to the bath according to manufacturer's specifications and instructions.

(iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(2) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a control system, as defined in §63.11511, "What definitions apply to this subpart?", to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(2)(i) through (v) of this section.

(i) You must install a control system designed to capture emissions from the affected tank and exhaust them to a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator.

(ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions.

(iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(v) You must follow the manufacturer's specifications and operating instructions for the control systems at all times.

(3) If you own or operate an affected batch electrolytic process tank, as defined in §63.11511, "What definitions apply to this subpart?" that contains one or more of the plating and polishing metal HAP and which is subject to the requirements in §63.11507(a), "What are my standards and management practices?" and you use a tank cover, as defined in §63.11511, to comply with §11507(a), (b) or (c) of this subpart, you must demonstrate initial compliance according to paragraphs (c)(3)(i) through (iv) of this section.

(i) You must install a tank cover on the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.

(iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(4) If you own or operate an affected continuous electrolytic process tank, as defined in §63.11511, "What definitions apply to this subpart?" that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?" and you cover the tank surface to comply with §11507(a), (b) or (c) of this subpart, you must demonstrate initial compliance according to paragraphs (c)(4)(i) through (iv) of this section.

(i) You must cover at least 75 percent of the surface area of the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the surface cover in place whenever the continuous electrolytic process is in operation.

(iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by limiting the plating time of the affected tank, you must demonstrate initial compliance according to paragraphs (c)(5)(i) through (iii) of this section.

(i) You must state in your Notification of Compliance Status that you limit short-term or flash electroplating to no more than 1 cumulative hour per day, or 3 cumulative minutes per hour of plating time.

(ii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(6) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must demonstrate initial compliance according to paragraphs (c)(6)(i) through (iv) of this section.

(i) You must install a tank cover on the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the plating time.

(iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(7) If you own or operate an affected tank that contains one or more of the plating and polishing metal HAP, uses cyanide in the bath, and is subject to the management practices specified in §63.11507(d), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(7)(i) through (iii) of this section.

(i) You must report in your Notification of Compliance Status the pH of the bath solution that was measured at startup, as defined in §63.11511, according to the requirements of §63.11507(d)(1).

(ii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11490(g), "What are my standards and management practices?", as practicable.

(8) If you own or operate an affected dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(e), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(8)(i) through (iii) of this section.

(i) You must install a control system that is designed to capture PM emissions from the polishing operation and exhaust them to a cartridge, fabric, or HEPA filter.

(ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions.

(iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(9) If you own or operate an existing affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(f)(1), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(9)(i) through (iii) of this section.

(i) You must install a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a water curtain, or a cartridge, fabric, or HEPA filter.

(ii) You must state in your Notification of Compliance Status that you have installed and are operating the control system according to the manufacturer's specifications and instructions.

(iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(10) If you own or operate a new affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(f)(2), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(10)(i) through (iii) of this section.

(i) You must install and operate a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a cartridge, fabric, or HEPA filter.

(ii) You must state in your Notification of Compliance Status that you have installed and operate the control system according to the manufacturer's specifications and instructions.

(iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(11) If you own or operate an affected temporary thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(f)(3), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(11)(i) and (ii) of this section.

(i) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(ii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(d) To demonstrate continuous compliance with the applicable management practices and equipment standards specified in this subpart, you must satisfy the requirements specified in paragraphs (d)(1) through (8) of this section.

(1) You must always operate and maintain your affected source, including air pollution control equipment.

(2) You must prepare an annual compliance certification according to the requirements specified in §63.11509(c), "Notification, Reporting, and Recordkeeping," and keep it in a readily-accessible location for inspector review.

(3) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate continuous compliance according to paragraphs (d)(3)(i) through (iii) of this section.

(i) You must record that you have added the wetting agent/fume suppressant to the tank bath in the original make-up of the tank.

(ii) For tanks where the wetting agent/fume suppressant is a separate ingredient from the other tank additives, you must demonstrate continuous compliance according to paragraphs (d)(3)(ii) (A) and (B) this section.

(A) You must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank; or in proportion such that the bath is brought back to the original make-up of the tank.

(B) You must record each addition of wetting agent/fume suppressant to the tank bath.

(iii) You must state in your annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.

(4) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a control system to comply with this subpart; an affected dry mechanical polishing operation that is subject to §63.11507(e); or an affected thermal spraying operation that is subject to §63.11507(f)(1) or (2), you must demonstrate continuous compliance according to paragraphs (d)(4)(i) through (v) of this section.

(i) You must operate and maintain the control system according to the manufacturer's specifications and instructions.

(ii) Following any malfunction or failure of the capture or control devices to operate properly, you must take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions.

(iii) You must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions.

(iv) You must record the results of all control system inspections, deviations from proper operation, and any corrective action taken.

(v) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by limiting the plating time for the affected tank, you must demonstrate continuous compliance according to paragraphs (d)(5)(i) through (iii) of this section.

(i) You must limit short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(ii) You must record the times that the affected tank is operated each day.

(iii) You must state in your annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(6) If you own or operate an affected batch electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements of §63.11507(a), "What are my standards and management practices?" or a flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), and you comply with §11507(a), (b) or (c) of this section by operating the affected tank with a cover, you must demonstrate continuous compliance according to paragraphs (d)(6)(i) through (iii) of this section.

- (i) You must operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.
- (ii) You must record the times that the tank is operated and the times that the tank is covered on a daily basis.
- (iii) You must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.

(7) If you own or operate an affected continuous electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must demonstrate continuous compliance according to paragraphs (d)(7)(i) and (ii) of this section.

- (i) You must operate the tank with at least 75 percent of the surface covered during all periods of electrolytic process operation.
- (ii) You must state in your annual certification that you have operated the tank with 75 percent of the surface covered during all periods of electrolytic process operation.

(8) If you own or operate an affected tank or other operation that is subject to the management practices specified in §63.11507(g), "What are my standards and management practices?", you must demonstrate continuous compliance according to paragraphs (d)(8)(i) and (ii) of this section.

- (i) You must implement the applicable management practices during all times that the affected tank or process is in operation.
- (ii) You must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

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

(a) If you own or operate an affected source, as defined in §63.11505(a), "What parts of my plant does this subpart cover?", you must submit an Initial Notification in accordance with paragraphs (a)(1) through (4) of this section by the dates specified.

- (1) The Initial Notification must include the information specified in §63.9(b)(2)(i) through (iv) of the General Provisions of this part.
- (2) The Initial Notification must include a description of the compliance method (e.g., use of wetting agent/fume suppressant) for each affected source.
- (3) If you start up your affected source on or before July 1, 2008, you must submit an Initial Notification not later than 120 calendar days after July 1, 2008.
- (4) If you startup your new affected source after July 1, 2008, you must submit an Initial Notification when you become subject to this subpart.

(b) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with paragraphs (b)(1) through (3) of this section.

(1) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in §63.11506, "What are my compliance dates?"

(2) The Notification of Compliance Status must include the items specified in paragraphs (b)(2)(i) through (iv) of this section.

- (i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources.
- (ii) Methods used to comply with the applicable management practices and equipment standards.
- (iii) Description of the capture and emission control systems used to comply with the applicable equipment standards.

(iv) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements.

(3) If a facility makes a change to any items in (b)(2)(i), iii, and (iv) of this section that does not result in a deviation, an amended Notification of Compliance Status should be submitted within 30 days of the change.

(c) If you own or operate an affected source, you must prepare an annual certification of compliance report according to paragraphs (c)(1) through (7) of this section. These reports do not need to be submitted unless a deviation from the requirements of this subpart has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report.

(1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that is subject to the requirements in §63.11507(a)(1), "What are my standards and management practices?", you must state in your annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.

(2) If you own or operate any one of the affected sources listed in paragraphs (c)(2)(i) through (iii) of this section, you must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions.

(i) Electroplating, electroforming, or electropolishing tank that is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a control system to comply with this subpart;

(ii) Dry mechanical polishing operation that is subject to §63.11507(e); or

(iii) Permanent thermal spraying operation that is subject to §63.11507(f)(1) or (2).

(3) If you own or operate an affected flash or short-term electroplating tank that is subject to the requirements in §63.11507(b), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by limiting the plating time of the affected tank, you must state in your annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(4) If you own or operate an affected batch electrolytic process tank that is subject to the requirements of §63.11507(a) or a flash or short-term electroplating tank that is subject to the requirements in §63.11507(b), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.

(5) If you own or operate an affected continuous electrolytic process tank that is subject to the requirements of §63.11507(a), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must state in your annual certification that you have covered at least 75 percent of the surface area of the tank during all periods of electrolytic process operation.

(6) If you own or operate an affected tank or other affected plating and polishing operation that is subject to the management practices specified in §63.11507(g), "What are my standards and management practices?" you must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

(7) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

(d) If you own or operate an affected source, and any deviations from the compliance requirements specified in this subpart occurred during the year, you must report the deviations, along with the corrective action taken, and submit this report to the delegated authority.

(e) You must keep the records specified in paragraphs (e)(1) through (3) of this section.

(1) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications.

(2) The records specified in §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part.

(3) The records required to show continuous compliance with each management practice and equipment standard that applies to you, as specified in §63.11508(d), "What are my compliance requirements?"

(f) You must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining 3 years.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

## Other Requirements and Information

### § 63.11510 What General Provisions apply to this subpart?

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

### § 63.11511 What definitions apply to this subpart?

Terms used in this subpart are defined in this section.

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

*Bath* means the liquid contents of a tank, as defined in this section, which is used for electroplating, electroforming, electropolishing, or other metal coating processes at a plating and polishing facility.

*Bench-scale* means any operation that is small enough to be performed on a bench, table, or similar structure so that the equipment is not directly contacting the floor.

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

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

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

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

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

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

*Conversion coatings* are coatings that form a hard metal finish on an object when the object is submerged in a tank bath or solution that contains the conversion coatings. Conversion coatings for the purposes of this rule include coatings composed of chromium, as well as the other plating and polishing metal HAP, where no electrical current is used.

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

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

(1) Fails to meet any requirement or obligation established by this rule including, but not limited to, any equipment standard (including emissions and operating limits), management practice, or operation and maintenance requirement;

(2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this rule and that is included in the operating permit for any affected facility required to obtain such a permit; or

(3) Fails to meet any equipment standard (including emission and operating limits), management standard, or operation and maintenance requirement in this rule during startup, shutdown, or malfunction.

*Dry mechanical polishing* means a process used for removing defects from and smoothing the surface of finished metals and formed products after plating or thermal spraying with any of the plating and polishing metal HAP, as defined in this section, using automatic or manually-operated machines that have hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles. The affected process does not include polishing with use of pastes, liquids, lubricants, or any other added materials.

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

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

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

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

*Electropolishing* means an electrolytic process performed in a tank after plating that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a work piece is attached to an anode immersed in a bath, and the metal substrate is dissolved electrolytically, thereby removing the surface contaminant; electropolishing is also called electrolytic polishing. For the purposes of this subpart, electropolishing does not include bench-scale operations.

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

*Filters*, for the purposes of this part, include cartridge, fabric, or HEPA filters, as defined in this section.

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

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

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

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

*Maintenance* is any process at a plating and polishing facility that is performed to keep the process equipment or the facility operating properly and is not performed on items to be sold as products.

*Major facility for HAP* is any facility that emits greater than 10 tpy of any HAP, or that emits a combined total of all HAP of over 25 tpy, where the HAP used to determine the total facility emissions are not restricted to only plating and polishing metal HAP or from only plating and polishing operations.

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

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

*Metal HAP content of material used in plating and polishing* is the HAP content as determined from an analysis or engineering estimate of the HAP contents of the tank bath or solution, in the case of plating, metal coating, or electropolishing; or the HAP content of the metal coating being applied in the case of thermal spraying. Safety data sheet (SDS) information may be used in lieu of testing or engineering estimates but is not required to be used.

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

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

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

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

*Plating and polishing facility* means a facility engaged in one or more of the following processes that uses or emits any of the plating and polishing metal HAP, as defined in this section: electroplating processes other than chromium electroplating ( *i.e.*, non-chromium electroplating); electroless plating; other non-electrolytic metal coating processes performed in a tank, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; thermal spraying; and the dry mechanical polishing of finished metals and formed products after plating or thermal spraying. Plating is performed in a tank or thermally sprayed so that a metal coating is irreversibly applied to an object. Plating and polishing does not include any bench-scale processes.

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

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

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

*Repair* means any process used to return a finished object or tool back to its original function or shape.

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

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

*Startup of the tank bath* is when the components or relative proportions of the various components in the bath have been altered from the most recent operating period. Startup of the bath does not include events where only the tank's heating or agitation and other mechanical operations are turned back on after being turned off for a period of time.

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

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

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

*Thermal spraying* (also referred to as metal spraying or flame spraying) is a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a metallic coating is applied by projecting heated, molten, or semi-molten metal particles onto a substrate. Commonly-used thermal spraying methods include high velocity oxy-fuel (HVOF) spraying, flame spraying, electric arc spraying, plasma arc spraying, and detonation gun spraying. This operation does not include spray painting at ambient temperatures.

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

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

[73 FR 37741, July 1, 2008, as amended at 76 FR 57921, Sept. 19, 2011]

## **§ 63.11512 Who implements and enforces this subpart?**

(a) This subpart can be implemented and enforced by EPA or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency, in addition to EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that cannot be delegated to State, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of an alternative non-opacity emissions standard under 40 CFR 63.6(g), of the General Provisions of this part.

(2) Approval of an alternative opacity emissions standard under §63.6(h)(9), of the General Provisions of this part.

(3) Approval of a major change to test methods under §63.7(e)(2)(ii) and (f), of the General Provisions of this part. A “major change to test method” is defined in §63.90.

(4) Approval of a major change to monitoring under §63.8(f), of the General Provisions of this part. A “major change to monitoring” is defined in §63.90.

(5) Approval of a major change to recordkeeping and reporting under §63.10(f), of the General Provisions of this part. A “major change to recordkeeping/reporting” is defined in §63.90.

**§ 63.11513 [Reserved]**

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

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

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

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

**Indiana Department of Environmental Management  
Office of Air Quality**

Addendum to the Technical Support Document (ATSD) for a New Source  
Review and Federally Enforceable State Operating Permit Renewal

<b>Source Background and Description</b>
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<b>Source Name:</b>	<b>Indiana Automotive Fasteners, Inc.</b>
<b>Source Location:</b>	<b>1300 West Anderson Boulevard, Greenfield, IN 46140</b>
<b>County:</b>	<b>Hancock</b>
<b>SIC Code:</b>	<b>3452 (Bolts, Nuts, Screws, Rivets and Washers)</b>
<b>Permit Renewal No.:</b>	<b>F059-31990-00024</b>
<b>Permit Reviewer:</b>	<b>Bruce Farrar</b>

On August 16, 2012, the Office of Air Quality (OAQ) had a notice published in the Daily Reporter, Greenfield, Indiana, stating that Indiana Automotive Fasteners, Inc. had applied for a FESOP NSR/Renewal to add a new coating line and update existing coating lines. The notice also stated that the OAQ proposed to issue a FESOP NSR/Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

<b>Comments and Responses</b>
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On August 14, 2012, Alpine Environmental, Inc. submitted comments to IDEM, OAQ on the draft FESOP NSR/Renewal.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

**Comment 1:**

SBL shot blaster (DS3), identified as EU-37, exhausts inside the buiding. Stack V37 has been removed.

**Response to Comment 1:**

IDEM agrees with the recommended changes, since it is a descriptive change only. The permit has been revised as follows:

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

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

\*\*\*

- (e) Dacrotizing Line 3, identified as DS3, constructed in 2009, approved for modification in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:

- (1) One (1) SBL shot blaster (DS3), identified as EU-37, with a combined maximum throughput of 343 Pounds of fasteners per hour and 560 lbs per hour of steel shot, controlled by cartridge filters, and exhausting through stack V37 inside the building.

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:** Dacrotizing Coating

\*\*\*

- (e) Dacrotizing Line 3, identified as DS3, constructed in 2009, approved for modification in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
  - (1) One (1) SBL shot blaster (DS3), identified as EU-37, with a combined maximum throughput of 343 Pounds of fasteners per hour and 560 lbs per hour of steel shot, controlled by cartridge filters, and exhausting through stack V37 inside the building.

\*\*\*

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

**D.2.1 PSD Minor Limits [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

Shotblaster ID	Control/Stack	PM Limit (lbs/hr)
SBL DSM (EU-8a)	Baghouse/V8	7.44
SBL DSM (EU-8b)	Baghouse/V8	7.44
SBL DS2 (EU-20a)	Baghouse/V20	7.44
SBL DS2 (EU-20b)	Baghouse/V20	7.44
SBL DS3 (EU-37)	Cartridge Filter/V37	1.54

\*\*\*

**D.2.4 Hazardous Air Pollutants (HAP) [326 IAC 2-4.1]**

The total HAP and manganese emissions from the five (5) shotblast units shall not exceed the following per twelve (12) consecutive month period:

Shotblaster ID	Control/Stack	Total HAPs Limit (tons/yr)	Manganese Limit (tons/yr)
SBL DSM (EU-8a)	Baghouse/V8	0.485	0.358
SBL DSM (EU-8b)	Baghouse/V8	0.485	0.358
SBL DS2 (EU-20a)	Baghouse/V20	0.485	0.358
SBL DS2 (EU-20b)	Baghouse/V20	0.485	0.358
SBL DS3 (EU-37)	Cartridge Filter/V37	0.089	0.06

\*\*\*

D.2.5 Particulate [326 IAC 6-3-2]

(Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Shotblaster ID	Control/Stack	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
SBL DSM (EU-8a)	Baghouse/V8	0.83	3.62
SBL DSM (EU-8b)	Baghouse/V8	0.83	3.62
SBL DS2 (EU-20a)	Baghouse/V20	0.47	2.47
SBL DS2 (EU-20b)	Baghouse/V20	0.47	2.47
SBL DS3 (EU-37)	Cartridge Filter/V37	0.45	2.40

D.2.9 Particulate Control

- (a) In order to comply with Conditions D.2.1, D.2.4 and D.2.5, the baghouses and cartridge filter for particulate control shall be in operation and control emissions from the shotblasters EU-8a, EU-8b, EU-20a, **and** EU-20b, ~~and EU-37~~ are in operation.

D.2.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) \*\*\*
- (b) In order to demonstrate compliance with Condition D.2.4, the Permittee shall perform a one time test for Manganese on one of the baghouses exhausting to stacks (V8, V20 ~~V37~~), utilizing methods as approved by the Commissioner not later than one hundred and eighty (180) days after the issuance of this permit. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

\*\*\*

D.2.11 Visible Emissions Notations

- (a) Visible emissions notations of the shot blasters stack exhausts (V8, **and** V20 ~~and V37~~) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

\*\*\*

D.2.13 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across each of the baghouses used in conjunction with each of the shotblasters (EU-8a, EU-8b, EU-20a, **and** EU-20b ~~and EU-37~~), at least once per day when any of the shotblasters are in operation. When for any one reading, the pressure drop across each of the baghouses is outside the normal range, the Permittee shall take reasonable response steps. The normal range for this unit is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit. A pressure reading that is outside the above mentioned range is not a deviation from this permit.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed FESOP NSR/Renewal can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the permit 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](http://www.idem.in.gov)

**Indiana Department of Environmental Management**  
Office of Air Quality

Technical Support Document (TSD) for a New Source Review and  
Federally Enforceable State Operating Permit Renewal

<b>Source Background and Description</b>
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<b>Source Name:</b>	<b>Indiana Automotive Fasteners, Inc.</b>
<b>Source Location:</b>	<b>1300 West Anderson Boulevard, Greenfield, IN 46140</b>
<b>County:</b>	<b>Hancock</b>
<b>SIC Code:</b>	<b>3452 (Bolts, Nuts, Screws, Rivets and Washers)</b>
<b>Permit Renewal No.:</b>	<b>F059-31990-00024</b>
<b>Permit Reviewer:</b>	<b>Bruce Farrar</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Indiana Automotive Fasteners, Inc. relating to the operation of a stationary automotive nuts and bolts manufacturing plant. On June 7, 2012, Indiana Automotive Fasteners, Inc. submitted an application to the OAQ requesting to renew its operating permit. Indiana Automotive Fasteners, Inc. was issued a FESOP (F059-21946-00024) on December 17, 2007. In addition, the Permittee has made the following changes, which are considered Title I changes:

- (a) The source has updated EU-6 by installing additional machines from 57 head forming machines and two (2) nut forming machines to 61 head forming machines, four (4) nut forming machines, six (6) nut tapping machines. The additional equipment increases the PTE for PM, PM10, PM2.5 VOC and HAPs for EU-6.
- (b) The source has added new emission units to the top coating line, identified as JC-06. These units include:
  - (1) One (1) top coating operation, identified as EU-45, with a maximum potential throughput of 20,000 parts per hour, using no controls, and exhausting inside the building;
  - (2) One (1) natural gas-fired pre-cure oven, identified as EU-46, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), and exhausting through Stack V-44; and
  - (3) One (1) natural gas-fired curing oven, consisting of six (6) burners, each rated at 0.15 MMBtu/hr, collectively identified as EU-47, with a combined maximum heat input capacity of 0.90 MMBth/hr, exhausting through Stacks V-45a and V-45b.
- (c) The source has moved the emission units EU-42, EU-43, and EU-44 to a new Dacrotizing Coating Line 1, identified as DS1. EU-43 will now use the thermal oxidizer as control.
- (d) The source has opted to include the thermal oxidizer as control for the Dacrotizing Coating Lines (DS2 and DS3) emission units EU-22 (DS2) and EU-38 (DS3).
- (e) The source has changed the identification of Dacrotizing Coating Line 1, identified as DC1, Dacrotizing Coating Line (DSM) with no change in emission units and EU-9 and EU9b will continue to use the thermal oxidizer as control.
- (f) The source has added one (1) boiler, identified as EU-15-2, rated at 1.977 MMBtu/hr.
- (g) The source has updated the descriptive information of boiler EU-15-1 from 2.1 MMBtu/hr to 1.977 MMBtu/hr.

<b>Permitted Emission Units and Pollution Control Equipment</b>
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The source consists of the following permitted and new emission units:

- (a) Sixty-one (61) head forming machines, four (4) nut forming machines, and six (6) nut tapping machines, collectively identified as EU-6, constructed between 1996 and 2007, each processing a maximum of 12,000 fasteners per hour (each fastener weighs 0.1 oz), each machine is controlled by its corresponding Smog Hog Electrostatic Precipitator, thirty-five (35) of the head forming machines exhausting to stacks V6:1-11 and the remaining machines exhausting within the building.
- (b) Dacrotizing Coating Line, identified as DSM, constructed in 1996, modified in 2009 and 2010, for the application of corrosion resistant coatings to ferrous-based metal fasteners, and consisting of:
  - (1) One (1) cleaner wash and natural gas fired dry-off oven (DSM), identified as EU-7, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V7A and V7B.
  - (2) Two (2) SBL shot blasters (DSM), identified as EU-8a and EU-8b, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
  - (3) One (1) dacrotizing metal treatment process (DSM), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V-9;
  - (4) One (1) natural gas fired dacrotizing oven, identified as EU-9a, constructed in 1996, rated at 1.0 MMBtu/hr, uncontrolled, and exhausting to stack V9;
  - (5) One (1) dacrotizing metal treatment process (DSM), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V9.
- (c) Dacrotizing Coating Line 1, identified as DS1, approved for construction in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
  - (1) One (1) dip coating operation (DS1), identified as EU-42, with a maximum throughput of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V42;
  - (2) One (1) natural gas-fired pre-cure oven (DS1), identified as EU-43, constructed in 2011, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), and exhausting through Stack V-44; and
  - (3) One (1) natural gas-fired curing oven, consisting of six (6) burners, each rated at 0.15 MMBtu/hr, constructed in 2011, collectively identified as EU-44, with a combined maximum heat input capacity of 0.90 MMBtu/hr, exhausting through Stacks V-43A and V-43B.
- (d) Dacrotizing Coating Line 2, identified as DS2, constructed in 2002, approved for modification in 2012 for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:

- (1) Two (2) SBL shot blasters (DS2), identified as EU-20a, and EU-20b, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;
  - (2) One (1) cleaner wash and natural gas fired dry-off oven (DS2), identified as EU-21, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V21-A and V21-B.
  - (3) One (1) dip coating operation (DS2), identified as EU-22, processing a maximum of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V22-A.
  - (4) One (1) natural gas fired dry-off oven (DS2), identified as EU-22b, rated at 0.7 MMBtu/hr, and exhausting to stack V22-B.
- (e) Dacrotizing Line 3, identified as DS3, constructed in 2009, approved for modification in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
- (1) One (1) SBL shot blaster (DS3), identified as EU-37, with a combined maximum throughput of 343 Pounds of fasteners per hour and 560 lbs per hour of steel shot, controlled by cartridge filters, and exhausting through stack V37.
  - (2) One (1) dip coating operation (DS3), identified as EU-38, with a maximum throughput of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V39;
  - (3) One (1) natural gas fired pre-cure oven (DS3), identified as EU-39, with one (1) burner rated at 0.14 MMBtu/hr, uncontrolled and exhausted through stack V39.
  - (4) One (1) natural gas fired cure oven (DS3) with a cooling zone, identified as EU-40, with six (6) burners rated at 0.16 MMBtu/hr, each, uncontrolled and exhausted through stacks V40-A & V40-B.
- (f) One (1) thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, used as control for emission units: DSM, DS1, DS2 and DS3. Stacks V9 (DSM), V42 (DS1), V22A (DS2) and V39 (DS3) will vent emissions to a header and then to the thermal oxidizer (EU-48) and exhausting to stack V46.
- (g) One (1) top coating line, identified as (JC-06), consisting of the following:
- (1) One (1) top coating operation, identified as EU-45, approved for construction in 2012, with a maximum potential throughput of 20,000 parts per hour, using no controls, and exhausting inside the building;
  - (2) One (1) natural gas-fired pre-cure oven, identified as EU-46, approved for construction in 2012, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), and exhausting through Stack V-44; and
  - (3) One (1) natural gas-fired curing oven, consisting of six (6) burners, each rated at 0.15 MMBtu/hr, approved for construction in 2012, collectively identified as EU-47, with a combined maximum heat input capacity of 0.90 MMBth/hr, exhausting through Stacks V-45a and V-45b.
- (h) Barrel Zinc Plating Line 1, identified as BZ1, constructed in 1996, for the application of zinc and chrome coatings to ferrous-based metal fasteners, and consisting of:

- (1) One (1) electric zinc plating oven, identified as EU-10, uncontrolled, and exhausting to stack V10;
- (2) One (1) zinc plating/ trivalent chromium treatment dip process, identified as EU-12, coating a maximum of 2,700 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V12;

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

- (i) Barrel Zinc Plating Line 2, identified as BZ2, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the following:

- (1) One (1) electric zinc plating oven, identified as EU-27, constructed in 1996, uncontrolled, and exhausting to stack V27;
- (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-26, constructed in 2002, coating a maximum of 2,700 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V26;

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

- (j) Barrel Zinc plating Line 3, identified as BZ3, constructed in 2009, for the application of zinc and chrome coatings to ferrous based metal fasteners, and including the following:

- (1) One (1) alkaline zinc plating and trivalent chromium treatment dip process, identified as EU-41, (no VOC's) coating a maximum of 3000 pounds of fasteners per hour, with packed fume scrubbers for control, and exhausting to stack V41.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

<b>Emission Units and Pollution Control Equipment Removed From the Source</b>
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The source has removed the following emission units:

- One (1) natural gas fired bake oven (TC), identified as EU-14, rated at 0.4 MMBtu/hr, processing a maximum of 76,000 fasteners per hour, uncontrolled, and exhausting to stack V14;

<b>Insignificant Activities</b>
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The source also consists of the following insignificant activities:

- (a) One (1) electric annealing oven (LAN), identified as EU-1, processing a maximum of 1,100 pounds of fasteners per hour, constructed in 1996, uncontrolled, and exhausting to stacks V1-A and V1-B;
- (b) One (1) electric bluing oven (AOQ) identified as EU-2, processing a maximum of 1,100 pounds of fasteners per hour, constructed in 1996, uncontrolled, and exhausting to stacks V2-A and V2-B;

- (c) Oil Quench Line 1 (OQ1), identified EU-3, constructed 1996, for the heat treatment of metal fasteners at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V24, V3, V4 & V5 and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu/hr;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) electric tempering furnace.
- (d) Four (4) natural gas fired boilers consisting of:
  - (1) EU-15, constructed in 1996, rated at 2.1 MMBtu/hr and exhausting to stacks V15; [326 IAC 6-2-4]
  - (2) EU-15-1, constructed in 1996, rated at 1.977 MMBtu/hr and exhausting to stacks V15-1; [326 IAC 6-2-4]
  - (3) EU-15-2, approved for construction in 2012, rated at 1.977 MMBtu/hr, and exhausting to stack V15-2; [326 IAC 6-2-4]
  - (4) EU-16, constructed in 1996, rated at 1.2 MMBtu/hr and exhausting to stack V16; [326 IAC 6-2-4]
- (e) Two (2) 7,000 gallon hydrochloric acid (HCL) storage tanks, identified as EU-18, constructed in 2007, controlled by the BZ2 scrubber, and exhausting to stack V26;
- (f) One (1) top coating line, identified as JC-03 using dip coating to apply VOC and HAP free coatings to metal fasteners, and consisting of:
  - (1) One (1) dip coating operation and natural gas fired dry-off oven, identified as EU-23, rated at 0.16 MMBtu/hr, processing a maximum of 700 pounds of fasteners per hour, uncontrolled, and exhausting to stacks V23-A and V23-B.
- (g) Oil Quench Line 2 (OQ2), identified EU-25, constructed in 2002, for the heat treatment of metal fasteners, at a rate of 7,000lb/hr, uncontrolled, exhausting to stacks V24, V25-A, V25-B, V25-C & V25-D, and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu/hr;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) natural gas fired tempering furnace, rated at 0.16 MMBtu/hr.
- (h) Oil Quench Line 3 (OQ3), identified EU-29, for the heat treatment of metal fasteners, at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V28, V29-A, V29-B & V29-C, and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu/hr;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) natural gas fired tempering furnace, rated at 0.16 MMBtu/hr.

- (i) Oil Quench Line 4 (OQ4), identified EU-31, for the heat treatment of metal fasteners at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V28, V31-A, V31-B & V31-C, and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) natural gas fired tempering furnace rated at 0.16MMBtu/hr.
- (j) Oil Quench Line 5 (OQ5), identified EU-33, for the heat treatment of metal fasteners, at a rate of 7000 lbs of fasteners/hr, uncontrolled, exhausting to stacks V32, V33-A, V33-B & V33-C, and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu/hr;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) natural gas fired tempering furnace, rated at 0.16 MMBtu/hr.
- (k) Lubricating Oil Quench Line (LOQ), identified as EU-34, for the heat treatment of metal fasteners, at a rate of 4800 per hour, uncontrolled, exhausting to stacks V34-A through V34-K, and consisting of:
  - (1) one (1) pre wash/dry unit,
  - (2) two (2) gas generators,
  - (3) four (4) natural gas-fired quenching furnaces, each rated at 0.34 MMBtu/hr,
  - (4) four (4) oil quenches,
  - (5) one (1) post wash/dry unit,
  - (6) two (2) natural gas-fired tempering furnaces, each rated at 0.18 MMBtu/hr;
  - (7) four (4) electric tempering furnaces; and
  - (8) six (6) cooling chambers.
- (l) Oil Quench Line 6 (OQ6), identified EU-35, for the heat treatment of metal fasteners, at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V32, V35-A, V35-B & V35-C, and consisting of:
  - (1) One (1) CO<sub>2</sub> Generator, using natural gas at the rate of 0.78 MMBtu/hr;
  - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
  - (3) One (1) natural gas fired tempering furnace, rated at 0.16MMBtu/hr.
- (m) Two (2) electric annealing batch ovens (LAN), identified as EU-36a & EU-36b, constructed in 2007, uncontrolled, and exhausting to stacks V36-a & V36-b. Each unit has a maximum processing capacity of 3100 pounds of fasteners per day.

<b>Existing Approvals</b>
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Since the issuance of the FESOP (059-21946-00024) on December 17, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 059-29877-00024 issued on January 20, 2011; and
- (b) Minor Permit Modification No. 059-28795-00024 issued on March 9, 2010; and

- (c) Administrative Amendment No. 059-28502-00024 issued on November 5, 2009; and
- (d) Significant Permit Modification No. 059-27527-00024 issued on June 18, 2009.

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.

<b>Enforcement Issue</b>
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There are no enforcement actions pending.

<b>Emission Calculations</b>
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The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

<b>County Attainment Status</b>
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The source is located in Hancock County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective October 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Hancock County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) PM<sub>2.5</sub>

Hancock County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> 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<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> 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**  
 Hancock County has been classified as attainment or unclassifiable in Indiana for all pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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	333.83
PM <sub>10</sub>	130.09
PM <sub>2.5</sub>	129.92
SO <sub>2</sub>	0.06
VOC	61.37
CO	7.76
NO <sub>x</sub>	9.24
GHGs as CO <sub>2</sub> e	11,160
Single HAP	17.99
Total HAP	40.18

HAPs	tons/year
Manganese	17.99
Methanol	5.58
Hydrochloric Acid	8.58
Chromium	3.33
Nickel	2.08
Xylene	0.72
Naphthalene	0.56
Chromium III	1.17
Hexane	0.17
<b>Total</b>	<b>40.18</b>

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 PM<sub>10</sub>, PM<sub>2.5</sub> and VOC are equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM<sub>10</sub>, PM<sub>2.5</sub> and VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) 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<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater 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 equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

**Potential to Emit After Issuance**

The source has opted to remain a FESOP source. 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 FESOP 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 <sub>10</sub> <sup>*</sup>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Head & Nut Forming Machines (Rolling Oil) (EU-6)	0.00	0.00	0.00	0.00	0.00	2.18	0.00	0.00	0.00	0.00
Head Forming & Nut Forming Machines (EU-6) <sup>1</sup>	106.20	74.95	74.95	-	-	9.81	-	-	6.00	5.07
Abrasive Blasting (EU-8a) <sup>2</sup>	32.06	6.18	6.18	0.00	0.00	0.00	0.00	0.00	0.485	0.358
Abrasive Blasting (EU-8b) <sup>2</sup>	32.06	6.18	6.18	0.00	0.00	0.00	0.00	0.00	0.485	0.358
Abrasive Blasting (EU-20a) <sup>2</sup>	32.06	6.18	6.18	0.00	0.00	0.00	0.00	0.00	0.485	0.358
Abrasive Blasting (EU-20b) <sup>2</sup>	32.06	6.18	6.18	0.00	0.00	0.00	0.00	0.00	0.485	0.358
Abrasive Blasting (EU-37) <sup>2</sup>	6.75	1.28	1.28	0.00	0.00	0.00	0.00	0.00	0.089	0.06
DSM Line (EU-9)	0.31	0.31	0.31	0.00	0.00	11.47	0.00	0.00	1.08	0.56
DSM Line (EU-9b)	0.19	0.19	0.19	0.00	0.00	10.85	0.00	0.00	0.20	0.20
DS1 Line (EU-42)	0.00	0.00	0.00	0.00	0.00	8.76	0.00	0.00	1.66	2.27
DS2 Line (EU-22)	0.00	0.00	0.00	0.00	0.00	8.76	0.00	0.00	1.66	2.27
DS3 Line (EU-38)	0.00	0.00	0.00	0.00	0.00	8.76	0.00	0.00	1.66	2.27
JC-06 Coating Line (EU-44)	0.01	0.01	0.01			0.21	-	-	-	-
BZ1 Zinc Plating / Chromium Dip (EU-12)	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	4.20	3.51
BZ2 Zinc Plating / Chromium Dip (EU-26)	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	4.20	3.51
BZ3 Zinc Plating / Chromium Dip (EU-41)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.95	1.56
Natural Gas Combustion (multiple units)	0.18	0.70	0.53	0.06	9.24	0.51	7.76	11,160	0.17	0.17
<b>Total PTE of Entire Source</b>	<b>243.97</b>	<b>98.85</b>	<b>98.67</b>	<b>0.06</b>	<b>9.24</b>	<b>61.37</b>	<b>7.76</b>	<b>11,160</b>	<b>&lt;25</b>	<b>&lt;10</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO <sub>2</sub> e	25	10

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs	Total HAPs	Worst Single HAP
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO <sub>2</sub> e	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".

1. PM10, PM2.5 and HAP emission limits to comply with 326 IAC 2-8 (FESOP). PM is unlimited PTE.
2. PM and HAP emission limits to comply with 326 IAC 2-2 (PSD) and 326 IAC 2-8 (FESOP). PM10 and PM2.5 are unlimited, uncontrolled emissions.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) PM10 emissions from the sixty-one (61) head forming machines, four (4) nut forming machines and six (6) nut tapping machines (EU-6) shall continue to not exceed 0.241 pounds per hour, each.

$$PM10 = (0.241 \text{ lb/hr}) * (61+4+6) * (876 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 62.81 \text{ tons/yr}$$

Note: Each unit is controlled by its corresponding Smog Hog Electrostatic Precipitator.

- (2) PM2.5 emissions from the sixty-one (61) head forming machines, four (4) nut forming machines and six (6) nut tapping machines (EU-6) shall continue to not exceed 0.241 pounds per hour, each.

$$PM10 = (0.241 \text{ lb/hr}) * (61+4+6) * (876 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 74.95 \text{ tons/yr}$$

Note: Each unit is controlled by its corresponding Smog Hog Electrostatic Precipitator.

- (3) The total HAP from the five (5) shotblast units shall not exceed the following per twelve (12) consecutive month period:

Shotblasters	Total HAPs Limit (tons/yr)
EU-8a	0.485
EU-8b	0.485
EU-20a	0.485
EU-20b	0.485
EU-37	0.089

- (4) Manganese emissions from the five (5) shotblast units shall not exceed the following per twelve (12) consecutive month period:

Shotblasters	Manganese Limit (tons/yr)
EU-8a	0.358
EU-8b	0.358
EU-20a	0.358
EU-20b	0.358
EU-37	0.06

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

- (b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM is limited to less than 250 tons per year, the potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall not exceed the following PM emissions for the shotblast units:

Shotblasters	PM Limit (lbs/hr)
EU-8a	7.44
EU-8b	7.44
EU-20a	7.44
EU-20b	7.44
EU-37	1.54

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

<b>Federal Rule Applicability</b>
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- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

**New Source Performance Standards (NSPS)**

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

### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of 40 CFR 63, Subpart N, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 14 and 326 IAC 20-8, are not included for this permit, because the plating and coating operations conducted at this source do not utilize hexavalent chromium.
- (d) The requirements of 40 CFR 63, Subpart T, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, which are incorporated by reference as 326 IAC 20-6, are not included for this permit, because this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (e) The requirements of 40 CFR 63 Subpart MMMM (4M), (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products), which are incorporated by reference as 326 IAC 20, are not included for this permit, because this source has limited its HAPs emissions to less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of total HAPs.
- (f) The requirements of 40 CFR 63, Subpart HHHHHH (6H), the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, which are incorporated by reference as 326 IAC 20, are not included for this permit, because although this metal automotive fastener manufacturing source uses coatings that contain compounds of chromium (Cr), they use dip application not spray application methods to apply the coatings.
- (g) This stationary metal automotive fastener manufacturing source is still subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plating and Polishing Operations, 40 CFR 63, Subpart WWWWWW (6W), which are incorporated by reference as 326 IAC 20, because each of the three (3) Barrel Zinc plating lines (BZ1-BZ3) contain trivalent chromium in the passivate bath solutions, in amounts greater than or equal to one tenth percent (0.1%).

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

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

Nonapplicable portions of the NESHAP will not be included in the permit.

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

- (h) The requirements of 40 CFR 63, Subpart XXXXXX (6X), the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, which are incorporated by reference as 326 IAC 20, are not included for this permit, because although this existing source manufactures metal automotive fasteners, it is not primarily engaged in the operations of any one of the nine metal fabrication and finishing source categories, as defined in 40 CFR 63.11514 and 63.11522.
- (i) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this source.

<b>State Rule Applicability - Entire Source</b>
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- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan)  
The source is subject to 326 IAC 1-6-3.
- (b) 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.
- (c) 326 IAC 5-1 (Opacity Limitations)  
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)
- (d) 326 IAC 6.5 PM Limitations Except Lake County  
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
- (e) 326 IAC 6.8 PM Limitations for Lake County  
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.
- (f) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

<b>State Rule Applicability – Individual Facilities</b>
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**State Rule Applicability – Individual Facilities**

**Head & Nut Forming Machines (EU-6)**

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
The 61 head forming machines, four (4) nut forming machines, and six (6) nut tapping machines collectively identified as EU-6, each processing a maximum of 75 lbs of metal per hour (12,000 fasteners/hr \* 0.1 oz/fastener \* 1lb/16 oz). Therefore, pursuant to 326 IAC 6-3-2(e)(2), the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is 0.551 pound per hour.

Note: To assure that each machine of EU-6 is exempted from 326 IAC 6-3, each corresponding Smog Hog Electrostatic Precipitator shall be in operation.

- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The 61 head forming machines, four (4) nut forming machines, and six (6) nut tapping machines collectively identified as EU-6, are not subject to 326 IAC 8-1-6, because the potential VOC emissions are less than twenty-five (25) tons per year.
- (c) There are no other 326 IAC 8 Rules that are applicable to these units.

**Dip Coating Operations DSM Line (EU-9, EU9b), DS1 Line (EU-42), DS2 Line (EU-22) and DS3 Line (EU-38)**

- (d) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(5), surface coating using dip coating are exempt from 326 IAC 6-3-2. Therefore, 326 IAC 6-3-2 does not apply to emission units EU-9, EU-9b, EU-22, EU-38, and. EU-42
  - (e) 326 IAC 8-2-9 (Miscellaneous Metal Coating)  
The dip coating operations, identified as EU-9, EU9b, EU-22, EU-38 and EU-42 are subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because the VOC emissions are greater than 15 pounds per day.
- (1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the dip coating operations (EU-9, EU9b, EU-22, EU-38 and EU-42) shall be limited to 3.5 pounds of VOCs per gallon of coating less water. The source has opted to comply with this limitation using a thermal oxidizer for VOC control.

Note: There is only one thermal oxidizer that is common to all the dip coating operations.

- (2) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the five (5) dip coating operations (EU-9, EU9b, EU-22, EU-38 and EU-42) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (1). The equivalent emissions limit was calculated to be 6.67 pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

$$\begin{aligned} E &= L / (1 - (L/D)) \\ &= 3.5 / (1 - (3.5/7.36)) \\ &= 6.67 \text{ lbs VOC/gallon of coating solids} \end{aligned}$$

Where:

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- D= Density of VOC in coating in pounds per gallon of VOC = 7.36 lbs/gal;
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

- (3) Pursuant to 326 IAC 8-1-2(c) and an overall efficiency of the thermal oxidizer of 65.64%, the VOC content of the coating shall not exceed 6.67 pounds of VOC per gallon of coating solids delivered to the applicator calculated by the following equation:

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

$$65.64\% = \frac{19.42 - 6.67}{19.42} \times 100$$

Where:

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

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

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

See Appendix A of this TSD for calculations.

- (4) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:
- (A) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (B) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (C) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (D) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (E) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

#### **Top Coating Line JC-06 (EU-45)**

- (f) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(14), the top coating line JC-06 has potential PM emission less than 0.551 lbs per hour. Therefore, 326 IAC 6-3-2 does not apply to EU-45.
- (g) 326 IAC 8-2-9 (Miscellaneous Metal Coating)  
Pursuant to 326 IAC 8-1-1(b), the top coating line JC-06 has potential VOC emission less than 15 lbs per day. Therefore, 326 IAC 8-2-9 (Miscellaneous Metal Coating) does not apply to EU-45.
- (h) There are no other 326 IAC 8 Rules that are applicable to this unit.

**Abrasive Blasting - Confined (EU-8a, EU-8b, EU-20a, EU-20b and EU-37)**

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
EU-8a	0.83	3.62
EU-8b	0.83	3.62
EU-20a	0.47	2.47
EU-20b	0.47	2.47
EU-37	0.45	2.40

The pound per hour limitation was calculated with the following equation:

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

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

The baghouses shall be in operation at all times the abrasive blasting equipment is in operation, in order to comply with this limit.

**Barrel Zinc Plating Operations BZ1 Line (EU-12), BZ2 Line (EU-26) and BZ3 Line (EU-41)**

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-2(b)(5), surface coating using dip coating are exempt from 326 IAC 6-3-2. Therefore, 326 IAC 6-3-2 does not apply to emission units EU-12, EU-26, and EU-41.
- (k) 326 IAC 8-2-9 (Miscellaneous Metal Coating) Pursuant to 326 IAC 8-2-1, the provisions of 326 IAC 8-2-9 apply to miscellaneous metal coating operations constructed after July 1, 1990, located in any county, and which have actual emissions of greater than fifteen (15) pounds per day before add-on controls. The potential to emit of the Barrel Zinc Plating Line 2 (EU-12) and Barrel Zinc Plating Line 2 (EU-26) are less than fifteen (15) pounds per day, therefore the requirements of 326 IAC 8-2-9 not applicable.
- (l) 326 IAC 8 (Volatile Organic Compound) The Barrel Zinc Plating Line 3 (EU-41), does not use a coating containing VOCs, therefore, EU-41 has no 326 IAC 8 requirements.
- (m) There are no other 326 IAC 8 Rules that are applicable to these units.

**Boilers (EU-15, EU-15-1, EU-15-2 and EU-16)**

- (n) 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating) The four (4) natural gas-fired boilers (EU-15, EU-15-1, EU-15-2 and EU-16), rated at 2.1, 1.977, 1.977 and 1.2 MMBtu/hr, respectively, constructed in 1996 (EU-15, EU-15-1 and EU-16) and approved for construction in 2012 (EU-15-2), are subject to 326 IAC 6-2-4 for

indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boilers shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = pounds of particulate matter emitted per million Btu of heat input  
Q = total source maximum operating capacity rating in million Btu per hour heat input = 12.6 MMBtu/hr

$$Pt = 1.09 / (12.6)^{0.26}$$

$$Pt = 0.56 \text{ pounds per MMBtu}$$

The potential worst case emissions from the boilers of 0.0074 lb/MMBtu of particulate matter are less than the allowable 0.56 lb/MMBtu. Therefore, the boilers are in compliance with this rule.

Pursuant to this rule, PM emissions from this source shall not exceed 0.56 pounds of particulate matter emitted per MMBtu.

### Natural Gas Combustion

- (o) 326 IAC 4-2-2 (Incinerators)  
The natural gas-fired ovens (EU-7, EU-9a, EU-21, EU-22B, EU-39, EU-40, EU-43, EU-44, EU-46, and EU-47) are each not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, 326 IAC 4-2-2 does not apply to the eight (8) ovens, and the requirements are not included in this permit.
- (p) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)  
The natural gas-fired ovens (EU-7, EU-9a, EU-21, EU-22B, EU-39, EU-40, EU-43, EU-44, EU-46, and EU-47) are each not sources of indirect heating, as defined in 326 IAC 1-2-19 "Combustion for indirect heating". Therefore, 326 IAC 6-2-2 does not apply to the eight (8) ovens, and the requirements are not included in this permit.
- (q) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(a), the natural gas-fired ovens (EU-7, EU-9a, EU-21, EU-22B, EU-39, EU-40, EU-43, EU-44, EU-46, and EU-47) are exempt from the requirements of 326 IAC 6-3, because they each do not meet the definition of a "manufacturing process". Therefore, the requirements are not included in this permit.
- (r) 326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)  
The natural gas-fired ovens (EU-7, EU-9a, EU-21, EU-22B, EU-39, EU-40, EU-43, EU-44, EU-46, and EU-47) are each not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions for each are less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively. Therefore, the requirements are not included in this permit.

### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance

Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

(a) The following emission units have applicable compliance determination conditions as follows:

Emission Unit/Control	Operating Parameters	Frequency	Method	
EU-6/ Electrostatic Precipitators	Visible Emissions	Daily	normal-Abnormal	Response Steps
EU-8a, EU-8b, EU-20a, EU-20b and EU-37/Baghouses	Water Pressure Drop	Daily	1.0 to 6.0 inches	Response Steps
	Visible Emissions		normal-Abnormal	
EU-9, EU-9b, EU-22, EU-38, EU-42/Thermal Oxidizer (EU-48)	Continuous monitoring (15 minutes)	3 hour average	at least 1,400°F	Response Steps
	duct pressure or fan amperage	Daily	normal range	Response Steps

These monitoring conditions are necessary because:

- (1) The electrostatic precipitators controlling particulate emissions from the 61 head forming machines, four (4) nut forming machines, six (6) nut tapping machines must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).
- (2) The baghouses controlling particulate emissions from Shotblast Units EU-8a, EU8b, EU-20a, EU-20b and EU-37 must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-8 (FESOP), 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP), and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).
- (3) The thermal oxidizer controlling VOC emissions from dip coating units (EU-9, EU-9b, EU-22, EU-38, EU-42) must operate properly to ensure compliance with 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations).

(b) The following emission units have applicable testing requirements as follows:

<b>Testing Requirements</b>				
<b>Emission Unit</b>	<b>Control Device</b>	<b>Pollutant</b>	<b>Timeframe for Testing</b>	<b>Frequency of Testing</b>
EU-6	Electrostatic Precipitators (ESP)	PM10 and PM2.5	not later than 180 days after issuance of permit	one time test
EU-8a, EU-8b, EU-20a, EU-20b or EU-37	Baghouse	Manganese	not later than 180 days after issuance of permit	one time test
EU-9, EU9b, EU-42, EU-22 and EU-38	One Thermal Oxidizer (EU-48)	VOC	not later than 60 days after installation of last unit or May 31, 2013	once every 5 years

- (a) The Permittee shall perform a one time test for PM10 and PM2.5 on one of the Electrostatic Precipitators (ESP) exhausting to a stack (V6:1-11) controlling the Head & Nut Forming Machines (EU-6), because the Electrostatic Precipitators must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).
- (b) The Permittee shall perform a one time test for Manganese on one of the shot blasters (EU-8a, EU-8b, EU-20a, EU-20b or EU-37). This testing condition is necessary because the baghouses controlling the shot blasters (EU-8a, EU-8b, EU-20a, EU-20b or EU-37), must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and make 326 IAC 2-4.1-1 not applicable. Testing is not required for PM, because the baghouses only need to achieve 48% efficiency to meet the PM limit.
- (c) On September 9, 2010, the thermal oxidizer was tested with an overall efficiency of 47.91%. The new overall efficiency limit for the thermal oxidizer is now 65.64%. Therefore in order to show compliance, OAQ Compliance has determine a retest is necessary either not later than sixty days after the installation of the last emission unit connected to the thermal oxidizer or not later than May 31, 2013, whichever is ealier.

**Recommendation**

The staff recommends to the Commissioner that the FESOP 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 June 7, 2012.

**Conclusion**

The operation of this stationary automotive nuts and bolts manufacturing plant shall be subject to the conditions of the attached FESOP Renewal No. 059-31990-00024.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 264-5401 or toll free at 1-800-451-6027 extension 4-5401.

- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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

**Company Name: Indiana Automotive Fasteners**  
**Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140**  
**Permit Renewal No.: F059-31990-00024**  
**Reviewer: Bruce Farrar**  
**Date: June 7, 2012**

Uncontrolled Potential to Emit Tons Per Year											
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Single HAP	
Head & Nut Forming Machines (Rolling Oil) (EU-06)	0.00	0.00	0.00	-	-	2.18	-	-	-	-	-
Head & Nut Forming Machines (EU-6)	106.20	106.20	106.20	-	-	9.81	-	-	6.00	5.07	Manganese
Abrasive Blasting (EU-8a, EU-8b, EU-20a, EU-20b,EU-37)	226.95	22.70	22.70	-	-	-	-	-	17.40	12.92	Manganese
DSM (EU-09)	0.31	0.31	0.31	-	-	11.47	-	-	1.08	0.56	Naphthalene
DSM (EU-09b)	0.19	0.19	0.19	-	-	10.85	-	-	0.20	0.20	Xylene
DS1 Line (EU-42)	0.00	0.00	0.00	-	-	8.76	-	-	1.66	1.66	Methanol
DS2 Line (EU-22)	0.00	0.00	0.00	-	-	8.76	-	-	1.66	1.66	Methanol
DS3 Line (EU-38)	0.00	0.00	0.00	-	-	8.76	-	-	1.66	1.66	Methanol
JC-06 Coating Line (EU-45)	0.01	0.01	0.01	-	-	0.21	-	-	-	-	-
BZ1 Line (EU-12)	0.00	0.00	0.00	-	-	0.03	-	-	4.20	3.51	HCl
BZ2 Line (EU-26)	0.00	0.00	0.00	-	-	0.03	-	-	4.20	3.51	HCl
BZ3 Line (EU-41)	-	-	-	-	-	-	-	-	1.95	1.56	HCL
Natural Gas Combustion	0.18	0.70	0.53	0.06	9.24	0.51	7.76	11,160	0.17	0.17	Hexane
<b>Totals:</b>	<b>333.83</b>	<b>130.09</b>	<b>129.92</b>	<b>0.06</b>	<b>9.24</b>	<b>61.37</b>	<b>7.76</b>	<b>11,160</b>	<b>40.18</b>	<b>17.99</b>	<b>Manganese</b>

Limited/Controlled Potential to Emit Tons Per Year											
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Single HAP	
Head & Nut Forming Machines Rolling Oil (EU-06)	0.00	0.00	0.00	-	-	2.18	-	-	-	-	-
Head & Nut Forming Machines (EU-6)	106.20	74.95	74.95	-	-	9.81	-	-	6.00	5.07	Manganese
Abrasive Blasting (EU-8a, EU-8b, EU-20a, EU-20b,EU-37)	137.10	22.70	22.70	-	-	-	-	-	2.03	1.50	Manganese
DSM (EU-09)	0.31	0.31	0.31	-	-	11.47	-	-	1.08	0.56	Naphthalene
DSM (EU-09b)	0.19	0.19	0.19	-	-	10.85	-	-	0.20	0.20	Xylene
DS1 Line (EU-42)	0.00	0.00	0.00	-	-	8.76	-	-	1.66	1.66	Methanol
DS2 Line (EU-22)	0.00	0.00	0.00	-	-	8.76	-	-	1.66	1.66	Methanol
DS3 Line (EU-38)	0.00	0.00	0.00	-	-	8.76	-	-	1.66	1.66	Methanol
JC-06 Coating Line (EU-45)	0.01	0.01	0.01	-	-	0.21	-	-	-	-	-
BZ1 Line (EU-12)	0.00	0.00	0.00	-	-	0.03	-	-	4.20	3.51	HCl
BZ2 Line (EU-26)	0.00	0.00	0.00	-	-	0.03	-	-	4.20	3.51	HCl
BZ3 Line (EU-41)	-	-	-	-	-	-	-	-	1.95	1.56	HCL
Natural Gas Combustion	0.18	0.70	0.53	0.06	9.24	0.51	7.76	11,160	0.17	0.17	Hexane
<b>Totals:</b>	<b>243.97</b>	<b>98.85</b>	<b>98.67</b>	<b>0.06</b>	<b>9.24</b>	<b>61.37</b>	<b>7.76</b>	<b>11,160</b>	<b>24.81</b>	<b>9.90</b>	<b>Manganese</b>

**Appendix A: Process Particulate Emissions  
Head forming and Nut forming Machines**

**Company Name: Indiana Automotive Fasteners  
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Permit Renewal No.: F059-31990-00024  
Reviewer: Bruce Farrar  
Date: June 7, 2012**

<b>Uncontrolled Potential Emissions (tons/year)</b>						
<b>Electrostatic Precipitators (ESP)</b>						
<b>Process</b>	<b>No. of Units</b>	<b>Grain Loading per Actual Standard Cubic Foot of Outlet</b>	<b>Face Velocity Across the Plates (ft/sec)</b>	<b>Total Face Surface Area (ft²)</b>	<b>Control Efficiency</b>	<b>Total (tons/yr)</b>
EU-6 (per unit)	1	0.00100	8.3	8.0	90.00%	1.50
EU-6 (combined units)	71					106.20
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						<b>106.20</b>

<b>Controlled Potential Emissions (tons/year)</b>						
<b>Electrostatic Precipitators (ESP)</b>						
<b>Process</b>	<b>No. of Units</b>	<b>Grain Loading per Actual Standard Cubic Foot of Outlet</b>	<b>Face Velocity Across the Plates (ft/sec)</b>	<b>Total Face Surface Area (ft²)</b>	<b>Control Efficiency</b>	<b>Total (tons/yr)</b>
EU-6 (per unit)	1	0.00100	8.3	8.0	90.00%	0.15
EU-6 (combined units)	71					10.62
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source control:						<b>10.62</b>

<b>Emission Unit</b>	<b>Process Weight Rate (tons/hr)<sup>1</sup></b>	<b>326 IAC 6-3-2 PM Limit (lbs/hr)*</b>
EU-6	0.04	0.45

1. 12,000 Fasteners/hour per machine \* (0.1 oz/fastener) \* (1 lb/16 oz) \* (1 ton/2000 lb)  
\* PM limit (lbs/hr) = process weight rate ^0.67 \*4.1

Methodology:

Uncontrolled Emissions

ESP (tons/yr) = No. Units \* Loading (grains/acf) \* Face Velocity (ft/sec) \* Surface Area (ft²) \* 1 lb/7,000 grains \* 60 sec/min \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs \* 1/(1-Control Efficiency)

Controlled Emissions

ESP (tons/yr) = No. Units \* Loading (grains/acf) \* Face Velocity (ft/sec) \* Surface Area (ft²) \* 1 lb/7,000 grains \* 60 sec/min \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs

**Appendix A: Process Particulate Emissions  
Potential Metal Hazardous Air Pollutant Process Emissions (MHAP)  
Head forming and Nut forming Machines**

**Company Name: Indiana Automotive Fasteners  
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Permit Renewal No.: F059-31990-00024  
Reviewer: Bruce Farrar  
Date: June 7, 2012**

Process	* Total Unlimited Uncontrolled Potential Particulate (tons/yr)	Weight % Chromium Compounds	Weight % Manganese Compounds	Weight % Nickel Compounds	Chromium Compounds Emissions (ton/yr)	Manganese Compounds Emissions (ton/yr)	Nickel Compounds Emissions (ton/yr)
EU-6 (single unit)	1.50	0.18%	1.09%	0.02%	0.01	0.07	0.00
EU-6 (combined units)	106.20	0.18%	1.09%	0.02%	0.84	5.07	0.09
<b>Total Uncontrolled Potential Emissions (tons/yr)</b>					<b>0.84</b>	<b>5.07</b>	<b>0.09</b>
<b>Control Efficiency (%)</b>					<b>90%</b>		
<b>Controlled Potential Emissions (tons/year)</b>					<b>0.08</b>	<b>0.51</b>	<b>0.01</b>

**Methodology:**

Uncontrolled Potential Emissions (tons/yr) = Total Potential Particulate (tons/yr) \* Weight % Metal HAP \* 8760 hr/yr \* 1 ton/2,000 lbs  
Controlled Potential Emissions (tons/yr) = Uncontrolled Potential Emissions (tons/yr) \*(1 - Control Efficiency (%))

**NOTES**

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

\* Total Unlimited Uncontrolled Potential Particulate Process Emissions from the Head forming and Nut forming Machines, taken from page 16 of 20, of this Appendix. Metal HAPS, including Cadmium, Chromium, Lead, Manganese and Nickel, are particulate in nature and can be controlled using a control device.



**Appendix A: Emission Calculations  
Abrasive Blasting - Confined  
EU-8a, EU-8b, EU-20a, EU-20b, EU-37**

**Company Name: Indiana Automotive Fasteners  
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Permit Renewal No.: F059-31990-00024  
Reviewer: Bruce Farrar  
Date: June 7, 2012**

Emission Unit	Rate (tons/hr)	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	Uncontrolled PM Emissions (ton/yr)	Uncontrolled PM10 Emissions (ton/yr)	Type of control	Control Efficiency (%)	Controlled PM Emissions (ton/yr)	Controlled PM10 Emissions (ton/yr)
EU-8a	0.83	17.00	1.70	61.50	6.15	Baghouse	95.00%	3.08	0.31
EU-8b	0.83	17.00	1.70	61.50	6.15	Baghouse	95.00%	3.08	0.31
EU-20a	0.47	17.00	1.70	35.22	3.52	Baghouse	95.00%	1.76	0.18
EU-20b	0.47	17.00	1.70	35.22	3.52	Baghouse	95.00%	1.76	0.18
EU-37	0.45	17.00	1.70	33.51	3.35	Baghouse	95.00%	1.68	0.17

**Total:**      226.95                      22.70                                      11.35                      1.13

**326 IAC 6-3-2 Particulate Emission Limitations**

Emission Unit	Process Weight Rate (tons/hr)	326 IAC 6-3-2 PM Limit (lbs/hr)*
EU-8a	0.83	3.62
EU-8b	0.83	3.62
EU-20a	0.47	2.47
EU-20b	0.47	2.47
EU-37	0.45	2.40

Assume PM10=PM2.5

\* PM limit (lbs/hr) = process weight rate ^0.67 \*4.1

Note: Emissions factors from USEPA's Factor Information Retrieval Data System, version 6.25 (SCC# 3-04-003-40)

**Methodology:**

Uncontrolled Emissions (ton/yr) = Rate (tons/hr) \* Emission Factor (lb/ton produced) \*8760 (hrs/yr) \* (1ton/2000lbs)

Controlled Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) \* (1 - Control Efficiency (%))

**Appendix A: Process Particulate Emissions  
 Potential Metal Hazardous Air Pollutant Process Emissions (MHAP)  
 Existing Abrasive Blasting Operations - Confined**

**Company Name: Indiana Automotive Fasteners  
 Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
 Permit Renewal No.: F059-31990-00024  
 Reviewer: Bruce Farrar  
 Date: June 7, 2012**

<b>Process</b>	<b>* Total Uncontrolled Potential Particulate (PM) (tons/yr)</b>	<b>Weight % Chromium Compounds</b>	<b>Weight % Manganese Compounds</b>	<b>Weight % Nickel Compounds</b>	<b>Chromium Compounds Emissions (ton/yr)</b>	<b>Manganese Compounds Emissions (ton/yr)</b>	<b>Nickel Compounds Emissions (ton/yr)</b>
EU-8a	61.50	0.25%	1.30%	0.20%	0.67	3.50	0.54
EU-8b	61.50	0.25%	1.30%	0.20%	0.67	3.50	0.54
EU-20a	35.22	0.25%	1.30%	0.20%	0.39	2.01	0.31
EU-20b	35.22	0.25%	1.30%	0.20%	0.39	2.01	0.31
EU-37	33.51	0.25%	1.30%	0.20%	0.37	1.91	0.29
<b>Total Uncontrolled Potential Emissions (tons/yr)</b>					<b>2.49</b>	<b>12.92</b>	<b>1.99</b>
<b>Control Efficiency (%)</b>					<b>95%</b>		
<b>Controlled Potential Emissions (tons/year)</b>					<b>0.12</b>	<b>0.65</b>	<b>0.10</b>

**Methodology:**

Uncontrolled Potential Emissions (tons/yr) = Total Potential Particulate (tons/yr) \* Weight % Metal HAP \* 8760 hr/yr \* 1 ton/2,000 lbs  
 Controlled Potential Emissions (tons/yr) = Uncontrolled Potential Emissions (tons/yr) \* (1 - Control Efficiency (%))

**Notes:**

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

**Appendix A: Emissions Calculations  
VOC and Particulate  
From DSM Line**

**Company Name:** Indiana Automotive Fasteners  
**Address City IN Zip:** 1300 West Anderson Boulevard, Greenfield, IN 46140  
**Permit Renewal No.:** F059-31990-00024  
**Reviewer:** Bruce Farrar  
**Date:** June 7, 2012

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Controlled VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Magni B06J* (EU-9)	12.39	42.90%	0.0%	42.9%	0.0%	64.70%	0.000088	5600.0	5.32	5.32	2.62	62.87	11.47	0.57	0.31	8.22	98%
Magni B18* (EU-9b)	9.34	53.80%	0.0%	53.8%	0.0%	37.10%	0.000088	5600.0	5.02	5.02	2.48	59.43	10.85	0.54	0.19	13.54	98%

Thermal Oxidizer control efficiency = **95%**

**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)

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

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

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

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

Magni B18 - 80 gallons  
 MPA - 10 gallons

**Appendix A: Emission Calculations  
HAP Emissions from New Coating Material  
DSM Line (EU-9 and EU-9b)**

**Company Name:** Indiana Automotive Fasteners  
**Address City IN Zip:** 1300 West Anderson Boulevard, Greenfield, IN 46140  
**Permit Renewal No.:** F059-31990-00024  
**Reviewer:** Bruce Farrar  
**Date:** June 7, 2012

Unlimited Emissions													
Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Cumene	Weight % Naphthlene	Weight % Xylene	Cumene Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Controlled Cumene Emissions (ton/yr)	Controlled Naphthalene Emissions (ton/yr)	Controlled Xylene Emissions (ton/yr)	
Magni B06J (EU-9)	12.39	0.000088	5,600.00	0.001%	2.11%	1.93%	0.0003	0.56	0.52	1.67E-05	0.03	0.03	
Magni B18 Mix (EU-9b)	9.34	0.000088	5,600.00	0%	0%	1.00%	0.00	0.00	0.20	0.00	0.00	1.01E-02	
<b>State Potential Emissions</b>							<b>Total Single HAPs</b>	<b>0.0003</b>	<b>0.56</b>	<b>0.72</b>	<b>1.67E-05</b>	<b>2.82E-02</b>	<b>3.59E-02</b>
							<b>Total Combined HAPs</b>	<b>1.28</b>			<b>0.06</b>		
Thermal Oxidizer control efficiency =								<b>95%</b>					

**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

**NOTES**

All surface coatings are applied using dip coating; therefore, particulate emissions are negligible  
 As Applied formulations: 80 gallons of B06J is mixed with 5 gallons of SC-150  
 80 gallons of B18 is mixed with 10 gallons MPA

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Dacrotizing Coating Lines**

Company Name: Indiana Automotive Fasteners  
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Permit Renewal No.: F059-31990-00024  
Reviewer: Bruce Farrar  
Date: June 7, 2012

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Controlled VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Dacrotizing Coating Line 1 (EU-42)																	
Geomet 720 Hybrid	11.69	64.34%	43.2%	21.1%	57.5%	12.72%	0.000027	30,000.0	5.81	2.47	2.00	48.02	8.76	0.44	0.00	19.42	100%
Dacrotizing Coating Line 2 (EU-22)																	
Geomet 720 Hybrid	11.69	64.34%	43.2%	21.1%	57.5%	12.72%	0.000027	30,000.0	5.81	2.47	2.00	48.02	8.76	0.44	0.00	19.42	100%
Dacrotizing Coating Line 3 (EU-38)																	
Geomet 720 Hybrid	11.69	64.34%	43.2%	21.1%	57.5%	12.72%	0.000027	30,000.0	5.81	2.47	2.00	48.02	8.76	0.44	0.00	19.42	100%

**6.00      144.06      26.29      1.31      0.00**

Thermal Oxidizer control efficiency = **95%**

**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)

Controlled 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) \* (1- Oxidizer control efficiency)

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)

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name: Indiana Automotive Fasteners  
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Permit Renewal No.: F059-31990-00024  
Reviewer: Bruce Farrar  
Date: June 7, 2012**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Methanol	Methanol Emissions (ton/yr)	Controlled Methanol Emissions (ton/yr)
Dacrotizing Coating Line 1 (EU-42)						
Geomet 720 Hybrid	11.69	0.000027	30,000.0	4.00%	1.66	0.08
Dacrotizing Coating Line 2 (EU-22)						
Geomet 720 Hybrid	11.69	0.000027	30,000.0	4.00%	1.66	0.08
Dacrotizing Coating Line 3 (EU-38)						
Geomet 720 Hybrid	11.69	0.000027	30,000.0	4.00%	1.66	0.08

Total State Potential Emissions **4.98** **0.25**

Thermal Oxidizer control efficiency = **95%**

**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

Controlled HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* (1- Control Efficiency)

**Appendix A: Emissions Calculations**  
**326 IAC 8-1-2 Compliance Calculations**  
**Dip coating Operations (EU-9, EU-9b, EU-22, EU-38, EU-42)**

**Company Name: Indiana Automotive Fasteners**  
**Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140**  
**Permit Renewal No.: F059-31990-00024**  
**Reviewer: Bruce Farrar**  
**Date: June 7, 2012**

Emission Unit	Material	Density (Lb/Gal)	lb VOC/gal solids
EU-9	Magni B06J* (EU-9)	12.39	8.22
EU-9b	Magni B18* (EU-9b)	9.34	13.54
EU-22	Geomet 720 Hybrid	11.69	19.42
EU-38	Geomet 720 Hybrid	11.69	19.42
EU-42	Geomet 720 Hybrid	11.69	19.42

**Operating Permit Requirements:**

[326 IAC 8-1-2(b)]

$$E = \frac{L}{(1 - (L/D))}$$

where: L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;  
L = 3.5 lb/gal *326 IAC 8-2-9(c)(2), air dried or forced warm air dried at temperatures*  
D = Density of VOC in coating in pounds per gallon of VOC;  
D = 7.36 lb/gal *Baseline solvent density*  
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.  
E = 6.67 lb/gal solids

[326 IAC 8-1-2(c)]

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

where: V = used, the daily weighted average VOC content of all coatings, as  
V = 19.42 lb/gal solids *VOC Content of worst case coating*  
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.  
E = 6.67 lb/gal solids *From calculation in 326 IAC 8-1-2(b) above.*  
O = Equivalent overall efficiency of the capture system and control device as a percentage.  
O = 65.64%

**Appendix A: Emissions Calculations**  
**VOC and Particulate**  
**From JC-06 Top Coating Line (EU-45)**

Company Name: Indiana Automotive Fasteners  
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Permit Renewal No.: F059-31990-00024  
Reviewer: Bruce Farrar  
Date: June 7, 2012

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Organics	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
Plus JL	9.70	75.00%	5.2%	10.00%	0.0000237	20000.0	0.50	0.10	0.05	1.14	0.21	0.01	5.00	99.9%
Plus JL Black	9.40	75.00%	5.3%	10.00%	0.0000237	20000.0	0.53	0.10	0.05	1.14	0.21	0.00	4.98	99.9%
<b>WORST CASE</b>											<b>0.21</b>	<b>0.01</b>		

**JC-06**

- Parts coated on this line will receive either Plus JL coating, or Plus JL Black coating, but never will they receive both coatings. Therefore, a Worst Case Scenario was calculated.
- Source supplied information of 90 milliliters of coating is used for each 1000 part load, equating to 0.023775 gallons per load. Each load is 1000 units, or 0.0000237 gallons per unit.
- Baskets containing parts to be coated will be cleaned using high-pressure washers using water only. There will be no solvents used in this process.

**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)

**Appendix A: Emissions Calculations  
Potential Particulate and VOC Emissions  
Existing Surface Coating and Treatment Operations**

Company Name: Indiana Automotive Fasteners  
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Permit Renewal No.: F059-31990-00024  
Reviewer: Bruce Farrar  
Date: June 7, 2012

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/year)	Actual hours (hours/yr)	Percent Recovered	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
<b>Barrel Zinc Plating Line (BZ-1)</b>																	
<b>Zinc Plater (EU-12)</b>																	
Ekolasid 455 Brightener	9.3	10.00%	0.0%	10.0%	0.0%	90.00%	440.00	6,000.00	90.00%	0.93	0.93	0.01	0.16	0.030	0.00	1.03	100%
<b>Chromate Dip (EU-12)</b>																	
Zinc P-1119	10.1	85.00%	0.0%	85.0%	0.0%	15.00%	2.00	6,000.00	90.00%	8.59	8.59	0.00	0.01	0.0013	0.00	57.23	100%
<b>Total</b>											9.51	0.01	0.17	<b>0.03</b>	<b>0.00</b>		
<b>Barrel Zinc Plating Line (BZ-2)</b>																	
<b>Zinc Plater (EU-27)</b>																	
Ekolasid 455 Brightener	9.3	10.00%	0.0%	10.0%	0.0%	90.00%	440.00	6,000.00	90.00%	0.93	0.93	0.01	0.16	0.030	0.00	1.03	100%
<b>Chromate Dip (EU-27)</b>																	
Zinc P-1119	10.1	85.00%	0.0%	85.0%	0.0%	15.00%	2.00	6,000.00	90.00%	8.59	8.59	0.00	0.01	0.0013	0.00	57.23	100%
<b>Total</b>											9.51	0.01	0.17	<b>0.03</b>	<b>0.00</b>		

**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/year) / Actual hours (hours/year)] \* (1-percent recovered)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* [Gal of Material (gal/year) / Actual hours (hours/year)] \* (24 hr/day) \* (1-percent recovered)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* [Gal of Material (gal/year) / Actual hours (hours/year)] \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = [(gal/year) / (hours/year)] \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs) \* (1-percent recovered)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

**NOTES**

Total Potential Emissions based on rated capacity at 8,760 hours/year.  
\* All surface coatings are applied using dip coating; therefore, particulate emissions are negligible

**Appendix A: Emission Calculations  
 Potential Hazardous Air Pollutant Process Emissions (HAP)  
 Existing Surface Coating and Treatment Operations**

**Company Name: Indiana Automotive Fasteners  
 Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
 Permit Renewal No.: F059-31990-00024  
 Reviewer: Bruce Farrar  
 Date: June 7, 2012**

Material	Density (Lb/Gal)	Gallons of Material (gal/hour)	Weight % Hydrochloric Acid	Weight % Methanol	Weight % Chromium III Compounds	Hydrochloric Acid Emissions (ton/yr)	Methanol Emissions (ton/yr)	Chromium III Compounds Emissions (ton/yr)	
<b>Barrel Zinc Plating Line (BZ-1)</b>									
<b>Zinc Plater (EU-12)</b>									
Hydrochloric Acid	9.68	0.26	31.50%	0%	0%	3.51	0	0	
Ekolasid 455 Brightener	9.26	0.07	0%	10.00%	0%	0	0.30	0	
						Control Efficiency (%)	3.51	0.30	0
							95%	95%	
						0.18	0.01		
<b>Chromate Dip (EU-12)</b>									
Liquid Trivalent Passivate	9.68	0.93	0%	0%	1.00%	0	0	0.39	
						0	0	0.39	
<b>Barrel Zinc Plating Line (BZ-2)</b>									
<b>Zinc Plater (EU-27)</b>									
Hydrochloric Acid	9.68	0.26	31.50%	0%	0%	3.51	0	0	
Ekolasid 455 Brightener	9.26	0.07	0%	10.00%	0%	0	0.30	0	
						Control Efficiency (%)	3.51	0.30	0
							95%	95%	
						0.18	0.01		
<b>Chromate Dip (EU-27)</b>									
Liquid Trivalent Passivate	9.68	0.93	0%	0%	1.00%	0	0	0.39	
						0	0	0.39	

**METHODOLOGY**

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

**NOTES**

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

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

**40 CFR 63. Subpart W (6W) Applicability Determination**

- o The liquid trivalent passivate, used in the BZ1 and BZ2 lines, and the Dacromet dip coating, each contain chromium in amounts greater than or equal to one tenth percent (0.1%) by weight.
- o Subpart 6W applies to each of the dip coating lines (DC1 and DS2) and to each of the barrel zinc plating lines (BZ1 and BZ2) liquid trivalent passivation processes.

**Appendix B: Emission Calculations  
Hazardous Air Pollutant Process Emissions (HAP)  
BZ3 Surface Treatment Line**

**Company Name: Indiana Automotive Fasteners  
Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
Permit Renewal No.: F059-31990-00024  
Reviewer: Bruce Farrar  
Date: June 7, 2012**

Acid Treatment and Acid Electrolysis						
Material	Density (Lb/Gal)	Gallons of Material (gal/hour)	Weight % Hydrochloric Acid	Hydrochloric Acid Emissions (ton/yr)	Control Efficiency*	Controlled Emissions
<b>#1 Acid Treatment</b>						
Hydrochloric Acid (30%)	9.68	0.17	9.67%	0.69	95%	0.03
<b>Acid Electrolysis</b>						
Hydrochloric Acid (30%)	9.68	0.13	9.67%	0.52	95%	0.03
<b>#2 Acid Treatment</b>						
Hydrochloric Acid (30%)	9.68	0.08	9.67%	0.35	95%	0.02
<b>Total State Potential Emissions</b>				<b>1.56</b>		<b>0.08</b>

**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

**NOTES**

\* The BZ3 Line is controlled by a Fiber-bed Mist Eliminator /Scrubber with at minimum a 95% control efficiency

Chromium Passivation							
Material	Density (Lb/Gal)	Maximum Material Usage Rate (gal/lbs of matl)	Maximum Process Rate (lbs of matl/hour)	Weight % Chromium III Compounds	Chromium III Compound Emissions (ton/yr)	Control Efficiency*	Controlled Emissions (ton/yr)
Liquid Trivalent Passivate	9.68	0.000307	3,023.51	1.00%	0.39	95%	0.02
<b>Total State Potential Emissions</b>					<b>0.39</b>		<b>0.02</b>

**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

**NOTES**

\* The BZ3 Line is controlled by a Fiber-bed Mist Eliminator /Scrubber with at minimum a 95% control efficiency

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

**40 CFR 63, Subpart WWWW (6W) Applicability Determination**

- o The Liquid Trivalent Passivate contains chromium in amounts greater than or equal to one tenth percent (0.1%) by weight.
- o Subpart 6W applies to BZ3 line's Liquid Trivalent Passivation process.

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

**Company Name: Indiana Automotive Fasteners  
 Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140  
 Permit Renewal No.: F059-31990-00024  
 Reviewer: Bruce Farrar  
 Date: June 7, 2012**

Combustion Units			
Emission Unit	MMBtu/hr	Emission Unit	MMBtu/hr
EU-3	0.79	EU-29	0.95
EU-7	0.30	EU-31	0.95
EU-9a	1.00	EU-33	0.95
EU-15	2.10	EU-35	0.95
EU-15-1	1.977	EU-34	1.72
EU-15-2	1.977	EU-39	0.14
EU-16	1.20	EU-40	0.96
EU-21	0.30	EU-43	0.14
EU-48	1.70	EU-44	0.90
EU-22b	0.7	EU-46	0.14
EU-23	0.16	EU-47	0.15
EU-25	0.95		
Combined Total Heat Input Capacity			<b>21.10</b>

Combined Total  
 Potential Throughput  
 MMCF/yr

**184.9**

	Criteria Pollutants						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	5.7	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.18	0.70	0.53	0.06	9.24	0.51	7.76

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is condensable PM2.5 only.

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

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**Permit Renewal No.:** F059-31990-00024  
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**Date:** June 7, 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 (e)	1.94E-04	1.11E-04	6.93E-03	1.664E-01	3.14E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr (e)	4.622E-05	1.017E-04	1.294E-04	3.513E-05	1.941E-04

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

<b>Total</b>	<b>0.17</b>	tons/yr
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**Methodology**

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Notes**

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

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Greenhouse Gas Emissions**

**Company Name: Indiana Automotive Fasteners**

**Address City IN Zip: 1300 West Anderson Boulevard, Greenfield, IN 46140**

**Permit Renewal No.: F059-31990-00024**

**Reviewer: Bruce Farrar**

**Date: June 7, 2012**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	11,092	0.2	0.2
Summed Potential Emissions in tons/yr	11,093		
CO2e Total in tons/yr	11,160		

**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.

Global 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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

*Thomas W. Easterly*  
**Commissioner**

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

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

**TO:** Gary Berling  
Indiana Automotive Fasteners, Inc.  
1300 W Anderson Boulevard  
Greenfield, IN 46140

**DATE:** September 20, 2012

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

**SUBJECT:** Final Decision  
Federally Enforceable State Operating Permit Renewal  
059-31990-00024

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

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

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

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Governor**

*Thomas W. Easterly*  
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[www.idem.IN.gov](http://www.idem.IN.gov)

September 20, 2012

TO: Hancock 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: Indiana Automotive Fasteners, Inc.**  
**Permit Number: 059-31990-00024**

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 9/20/2012 Indiana Automotive Fasteners, Inc. 059-31990-00024 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Gary Berling Indiana Automotive Fasteners, Inc. 1300 W Anderson Blvd Greenfield IN 46140 (Source CAATS)										
2		Hancock County Commissioners 111 American Legion #219 Greenfield IN 46140 (Local Official)										
3		Hancock County Public Library 900 West McKenzie Greenfield IN 46140-1741 (Library)										
4		Hancock County Health Department 111 America Legion Greenfield IN 46140-2365 (Health Department)										
5		Greenfield City Council and Mayors Office 10 S. State St. Greenfield IN 46140 (Local Official)										
6		Timothy Scroggins 3171 W 1000 N Fortville IN 46040 (Affected Party)										
7		Robert Downey Alpine Environmental, Inc 1715 West Foxcliff Drive South Martinsville IN 46151 (Consultant)										
8		Avery Dennison Corporation 870 Anderson Boulevard Greenfield in 46140 (Affected Party)										
9		Keihin North America, Inc. 400 West New Road Greenfield IN 46140 (Affected Party)										
10		Indiana Box 2200 Royal Drive Greenfield IN 46140 (Affected Party)										
11		Unique Printing Labels 2181 Royal Drive Greenfield IN 46140 (Affected Party)										
12		Hancock Wellness Center 888 West New Road Greenfield IN 46140 (Affected Party)										
13		MPI Release Technologies 2162 North Hastings Boulevard Greenfield IN 46140 (Affected Party)										
14		Theresa Melton 1941 West New Road Greenfield IN 46140 (Affected Party)										
15		T/C Land LLC 2274 North Fortville Pike Greenfield IN 46140 (Affected Party)										

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IDEM Staff	PWAY 9/19/2012 Indiana Automotive Fasteners, Inc. 31990 (draft/final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Tracy 1135 West New Road Greenfield IN 46140 (Affected Party)									
2											
3											
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5											
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