



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 28, 2013

RE: Standard Locknut, LLC/057-32013-00041

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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New Source Review and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Standard Locknut, LLC.
1045 E. 169th Street
Westfield, Indiana 46074**

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation, or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

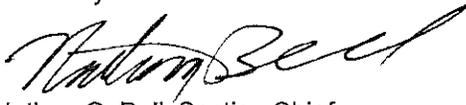
Operation Permit No. M057-32013-00041	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 28, 2013 Expiration Date: January 28, 2018

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary contract machining source, manufacturing steel locknuts.

Source Address:	1045 E. 169th Street, Westfield, Indiana 46074
General Source Phone Number:	(317) 399-2242
SIC Code:	3451 (Screw Machine Products)
County Location:	Hamilton
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) spray paint booth, identified as SPB2, constructed in 1994, with a maximum capacity of 20 metal parts per hour, using an air assisted airless application method and dry filters for particulate control, and exhausting to PB Stack.
- (b) Fifty-one (51) dip tanks, identified as DT #1 through #51, constructed in 1994, for application of rust protectant (RP) by submersion, coating a maximum of 2,283.78 locknuts per hour using 0.00056 gallons of coating per locknut, uncontrolled and exhausting to the atmosphere. Forty-one (41) of the dip tanks are covered and ten (10) are uncovered.
- (c) Metal machining where an aqueous cutting coolant continuously floods the machining interface. This source tools about nine million (9,000,000) locknuts per year, using a maximum coolant replacement volume of 7,920 gal/yr, per 85 machines, based on an actual operating schedule of 22.5 hrs per workday, 5 days per week, and 50 weeks per year (5,625 hrs/yr).

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, M057-32013-00041, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M057-32013-00041 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]: Paint Booth

- (a) One (1) spray paint booth, identified as SPB2, constructed in 1994, with a maximum capacity of 20 metal parts per hour, using an air assisted airless application method and dry filters for particulate control, and exhausting to PB Stack.

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

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

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

In order to render the requirements of 326 IAC 8-2-9 not applicable, the spray paint booth (SPB2) shall be limited as follows:

VOC input to spray paint booth (SPB2) shall be less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each day.

Compliance with this limit shall render the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the following shall apply:

- (a) Particulate from the spray paint booth SPB2 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.1.1 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.1.5 Particulate Control

In order to comply with Condition D.1.2, the dry particulate filter for particulate control shall be in operation and control emissions from the spray paint booth SPB2 at all times the spray paint booth is in operation.

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) 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 content limit established in Condition D.1.1.
- (1) The VOC content of each coating material and diluent solvent used less water.
 - (2) The amount of coating material and diluent solvent used on a daily 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;
 - (b) To document the compliance status with Condition D.1.3(c), the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
 - (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.7 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-6.1-5 by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Standard Locknut, LLC.
Address:	1045 E. 169th Street
City:	Westfield, Indiana 46074
Phone #:	(317) 399-2242
MSOP #:	M057-32013-00041

I hereby certify that Standard Locknut, LLC. is :

still in operation.

no longer in operation.

I hereby certify that Standard Locknut, LLC. is :

in compliance with the requirements of MSOP M057-32013-00041.

not in compliance with the requirements of MSOP M057-32013-00041.

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

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

Noncompliance:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

MSOP Quarterly Report

Source Name: Standard Locknut, LLC.
 Source Address: 1045 E. 169th Street, Westfield, Indiana 46074
 MSOP No.: M057-32013-00041
 Facility: Spray paint booth (SPB2)
 Parameter: **VOC Input (pounds/day)**
 Limit: VOC input to spray paint booth (SPB2) shall be less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each day.

Quarter: _____ Year: _____

Day	Month 1	Month 2	Month 3	Day	Month 1	Month 2	Month 3
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16							

- No deviation occurred in this quarter.
 Deviation/s occurred in this quarter.
 Deviation has been reported on _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration Transitioning to a Minor Source Operating Permit (MSOP) with New Source Review (NSR)

Source Description and Location

Source Name: Standard Locknut, LLC.
Source Location: 1045 E. 169th Street, Westfield, Indiana 46074
County: Hamilton
SIC Code: 3451 (Screw Machine Products)
Operation Permit No.: M057-32013-00041
Permit Reviewer: Hannah L. Desrosiers

On June 14, 2012, the Office of Air Quality (OAQ) received an application from Standard Locknut, LLC., related to the construction and operation of new emission units at an existing stationary contract machining source, manufacturing steel locknuts, and transition from a Registration to a MSOP.

Existing Approvals

The source was issued Registration No. 057-4109-00041 on November 30, 1994. The source has since received Notice-Only Change No. 057-24233-00041, issued on March 28, 2007.

Due to this application, the source is transitioning from a Registration to a MSOP.

County Attainment Status

The source is located in Hamilton County. The following attainment status designations are applicable to Hamilton County:

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
PM _{2.5}	Basic nonattainment designation effective federally April 5, 2005.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

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

(Air Pollution Control Board; 326 IAC 1-4-30; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)

(a) Ozone Standards

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

(b) PM_{2.5}

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Hamilton County as nonattainment for PM_{2.5}. On March 7, 2005, the Indiana Attorney General's

Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

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

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) 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.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Standard Locknut, LLC on June 14, 2012, relating to the construction of 51 dip tanks used for applying rust prevention to finished metal locknuts.

The source consists of the following permitted emission units:

- (a) One (1) spray paint booth, identified as SPB2, constructed in 1994, with a maximum capacity of 20 metal parts per hour, using an air assisted airless application method and dry filters for particulate control, and exhausting to PB Stack.
- (b) Metal machining where an aqueous cutting coolant continuously floods the machining interface. This source tools about nine million (9,000,000) locknuts per year, using a maximum replacement volume of 7,920 gal/yr, per 85 machines, based on an actual operating schedule of 22.5 hrs per workday, 5 days per week, and 50 weeks per year (5,625 hrs/yr).

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

Fifty-one (51) dip tanks, identified as DT #1 through #51, constructed in 1994, for application of rust protectant (RP) by submersion, coating a maximum of 2,283.78 locknuts per hour using 0.00056 gallons of coating per locknut, uncontrolled and exhausting to the atmosphere. Forty-one (41) of the dip tanks are covered and ten (10) are uncovered.

Enforcement Issues

IDEM is aware that the fifty-one (51) dip tanks were constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction and operating permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	5.19
PM10 ⁽¹⁾	5.19
PM2.5	5.19
SO ₂	0
NO _x	0
VOC	61.04
CO	0
GHGs as CO ₂ e	0
TOTAL HAPs	0.88
"Worst" Single HAP	0.71 (DGME)
<i>DGME = Diethylene glycol monobutyl ether</i>	
(1) 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".	

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Paint Booth	5.19	5.19	5.19	0	0	6.57	0	0	0.14	0.13 (cobalt)
Dip Tanks	0	0	0	0	0	29.51	0	0	0.74	0.71 (DGME)
Machining Coolant	0	0	0	0	0	24.96	0	0	0	NA
Total PTE of Entire Source	5.19	5.19	5.19	0	0	61.04	0	0	0.88	0.71 (DGME)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA
NA = not applicable *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) 40 CFR 60 Subpart TT - Standards for Metal Coil Surface Coating
 The requirements of the New Source Performance Standards (NSPS) for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (2T) (326 IAC 12), are not included in the permit, since the surface coating operations conducted at this source do not meet the definition of a metal coil surface coating operation, as defined in §60.46: Definitions. This source applies surface coatings to metal locknuts not metal coil, as defined in 40 CFR 60.461.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) 40 CFR 63, Subpart T - NESHAPs for Halogenated Solvent Cleaning
 The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit because this source does not use a cold solvent cleaning machine or any degreasing solvent that contains any of the halogenated compounds listed in §63.460(a).
- (b) 40 CFR 63 Subpart M - NESHAPs for Miscellaneous Metal Parts and Products Surface Coating
 The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart M (4M) (326 IAC 20-80), are not included in the permit because although coatings containing hazardous air pollutants (HAP) are applied to miscellaneous metal parts and products, as defined in §63.3881(a), this source is not a major source of HAPs. The potential of emit of any single HAP is less than ten (10) tons per year and any combination of HAPs is less than twenty-five (25) tons per year.

- (c) 40 CFR 63, Subpart - SSSS - NESHAPs: Surface Coating of Metal Coil
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Coil, CFR 63, Subpart SSSS (4S) (326 IAC 20-64), are not included in this permit, since the surface coating operations conducted at this source do not meet the definition of a coil coating line, as defined in §63.5110, and this existing source is not a major source of hazardous air pollutant emissions, as defined in §63.2.
- (d) 40 CFR 63, Subpart HHHHHH - NESHAP Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (6H), are not included in the permit, because although this existing source meets the definition of an area source, as defined in 40 CFR 63.2, and uses spray application methods to coat metal castings, the coatings used do not contain compounds of cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni). Additionally, this source does not perform paint stripping using Methylene Chloride (MeCl), and does not conduct any autobody refinishing operations.
- (e) 40 CFR 63, Subpart WWWWWW - NESHAPs for Plating and Polishing Operations
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plating and Polishing Operations, 40 CFR 63, Subpart WWWWWW (6W), are not included in the permit for the fifty-one (51) dip tanks, identified as DT #1 through #50, because none of the tanks contain or have the potential to emit any of the specifically listed plating or polishing metal HAPs, (i.e., compounds of cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni), or any of these metals in the elemental form).
- (f) 40 CFR 63, Subpart XXXXXX - NESHAPs for Nine Metal Fabrication and Finishing Source Categories
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX (6X), are not included in the permit, since although this source meets the definition of an area source, as defined in 40 CFR 63.2, this source is not primarily engaged in the operations listed in one of the nine metal fabrication and finishing source categories, as defined in §63.11514 and §63.11522.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination - Entire Source

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e 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.

- (c) 326 IAC 1-7 (Stack Height)
The potential to emit PM, PM10, and PM2.5, from each of the emission units at this source is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 1-7 do not apply, and are not included in the permit.
- (d) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This existing source, located in Hamilton County, is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM2.5), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (e) 326 IAC 2-3 (Emission Offset)
Hamilton County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants, except PM2.5, which is regulated under 326 IAC 2-1.1-5 (Nonattainment New Source Review). Therefore, the requirements of 326 IAC 2-3 do not apply, and are not included in the permit.
- (f) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs from the entire source is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (g) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided for in 326 IAC 2-6-5.
- (h) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (i) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (j) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability Determination – Individual Facilities

Spray Paint Booth

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the spray paint booth (SPB2) shall be controlled by dry particulate filter, waterwash, or an equivalent control device, and be subject to the following:

- (1) The source shall operate the control device in accordance with manufacturer's specifications.
- (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

(b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The spray paint booth (SPB2) is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations). Therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.

(c) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
The spray paint booth (SPB2) is subject to 326 IAC 8-2-9 because it was constructed after July 1, 1990, it coats metal parts under Standard Industrial Classification (SIC) Code major group #34, and has potential VOC emissions (before control) of greater than fifteen (15) pounds per day. However, the source has elected to limit VOC emissions from spray paint booth (SPB2) to less than fifteen (15) pounds per day in order to render the requirements of 326 IAC 8-2-9 not applicable. Therefore, the requirements of 326 IAC 8-2-9 do not apply.

In order to render the requirements of 326 IAC 8-2-9 not applicable, the spray paint booth (SPB2) shall be limited as follows:

- VOC input to spray paint booth (SPB2) shall be less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each day.

Compliance with this limit shall render the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.

Records of daily coating usage (in gallons) and the VOC content of each coating, and all diluent and clean-up solvents, in pounds VOC per gallon less water as applied shall be maintained, and quarterly reports submitted.

See Appendix A, for the detailed calculations.

- (d) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
The solvent clean-up activities occurring in spray paint booth (SPB2) are not of a type as described in subdivisions 326 IAC 8-3-1(b)(1)(A) through 326 IAC 8-3-1(b)(1)(C). Therefore, the requirements of 326 IAC 8-3 do not apply to the solvent clean-up activities occurring in spray paint booth (SPB2), and are not included in the permit.
- (e) There are no other 326 IAC 8 Rules applicable to spray paint booth (SPB2).

51 Dip Tanks

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(5), surface coating operations using dip coating are specifically exempted from the rule. Therefore, the requirements of 326 IAC 6-3 do not apply to the 51 Dip Tanks, and are not included in the permit.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The 51 Dip Tanks are each subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations). Therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.
- (c) 326 IAC 8-2-4 Coil coating operations
The requirements of 326 IAC 8-2-4 are not included in the permit for the 51 Dip Tanks, because each tank is used to apply coatings to locknuts and not flat metal sheets or strips that come in rolls or coils.
- (d) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
The requirements of 326 IAC 8-2-9 are not included in the permit for the 51 Dip Tanks, because although each tank was constructed after July 1, 1990, and is used to coat metal parts under Standard Industrial Classification (SIC) Code major group #34, the actual before control emissions from each tank are less than fifteen (15) pounds per day.

See Appendix A, for the detailed calculations.

- (e) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
The solvent clean-up activities occurring in the dip coating operations are not of a type as described in subdivisions 326 IAC 8-3-1(b)(1)(A) through 326 IAC 8-3-1(b)(1)(C). Therefore, the requirements of 326 IAC 8-3 do not apply to the 51 Dip Tanks and are not included in the permit.
- (f) There are no other 326 IAC 8 Rules applicable to the dip coating operations.

Metal Machining Operation

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
(1) The potential to emit particulate from the metal machining operation, where an aqueous cutting coolant continuously floods the machining interface, is less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) the metal machining operation is exempt from 326 IAC 6-3, and the requirements are not included in the permit.
(2) Pursuant to 326 IAC 6-3-1(b)(7), surface coating operations using flow coating are specifically exempted from the rule. Therefore, the requirements of 326 IAC 6-3 do not apply to the coolant usage in the machining operation, and are not included in the permit.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The coolant usage in the metal machining operation is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations). Therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.

- (c) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
The requirements of 326 IAC 8-2-9 are not included in the permit for the coolant usage in the metal machining operation, because although each machine was constructed after July 1, 1990, and the coolant is used to coat metal parts under Standard Industrial Classification (SIC) Code major group #34, the actual before control emissions from each tank are less than fifteen (15) pounds per day.

See Appendix A, for the detailed calculations.

- (d) There are no other 326 IAC 8 Rules that are applicable to the metal machining operation.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination requirements applicable to the source are as follows:

Emission Unit/Control	Operating Parameters	Method
spray paint booth (SPB2)	VOC content	Preparing or obtaining the "as supplied" and "as applied" VOC data sheets
		Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

- (1) Confirmation of the VOC content of the coatings used in the spray paint booth (SPB2) is required to determine compliance with the provisions of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations).
- (2) The dry filters, for particulate control, shall be in operation and control emissions at all times that spray paint booth (SPB2) is in operation.
- (3) There are no specific compliance determination requirements for the 51 Dip Tanks or the Metal Machining Operations at this existing source.
- (b) There are no specific compliance monitoring requirements for the spray paint booth (SPB2), the 51 Dip Tanks, or the Metal Machining Operations at this existing source.
- (c) There are no specific testing requirements associated with any of the emission units at this existing source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 14, 2012.

The operation of this source shall be subject to the conditions of the attached proposed New Source Review and MSOP No.: M057-32013-00041. The staff recommends to the Commissioner that this New Source Review and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers 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) 233-9327 or toll free at 1-800-451-6027 extension 3-9327.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

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

**Appendix A: Emissions Calculations
Emission Summary**

Company Name: Standard Locknut, LLC
Source Address: 1045 East 169th Street, Westfield, Indiana 46074
Permit Number: M057-32013-00041
Permit Reviewer: Hannah L. Desrosiers

Uncontrolled Potential Emissions (tons/year)					
Category	Emissions Generating Activity				
	Pollutant	Paint Booth	Dip Tanks	Machining Coolant	TOTAL
Criteria Pollutants	PM	5.19	0.00	0.00	5.19
	PM10	5.19	0.00	0.00	5.19
	PM2.5	5.19	0.00	0.00	5.19
	SO2	0	0	0	0
	NOx	0	0	0	0
	VOC	6.57	29.51	24.96	61.04
	CO	0	0	0	0
	GHGs as CO2e	0	0	0	0
Hazardous Air Pollutants	DGME	0	0.71	0	0.71
	Toluene	0	0.033	0	0.033
	Xylenes	0.012	0	0	0.01
	Cobalt	0.127	0	0	0.13
	Totals	0.14	0.74	0	0.88
			Worst Single HAP	0.71	

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

**Appendix A: Emissions Calculations
Volatile Organic Compound (VOC) and Particulate Emissions
from Surface Coating Operations
Spray Paint Booth (SPB2)**

Company Name: Standard Locknut, LLC
Source Address: 1045 East 169th Street, Westfield, Indiana 46074
Permit Number: M057-32013-00041
Permit Reviewer: Hannah L. Desrosiers

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Material Usage (gal/unit)	Maximum Throughput (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	Actual VOC pounds per day	Potential VOC tons per year	Actual VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
W/R Gray Enamel	8.81	75.09%	38.77%	36.32%	40.65%	18.71%	0.0234	20	5.39	3.20	1.50	36.00	11.25	6.57	2.81	1.58	17.10	65%
W/R Green A/D Enamel	8.78	73.72%	41.15%	32.57%	39.62%	20.76%	0.0234	20	4.74	2.86	1.34	32.18	10.05	5.87	2.51	1.66	13.78	65%
W/R Black A/D Enamel	8.82	73.85%	39.16%	34.69%	40.05%	19.91%	0.0234	20	5.10	3.06	1.43	34.43	10.76	6.28	2.69	1.66	15.37	65%
Devflex 4020 PF Primer Red	11.28	35.94%	30.00%	5.94%	28.78%	42.44%	0.0234	20	0.94	0.67	0.31	7.54	4.71	1.38	0.29	5.19	1.58	65%
PTE of Worst Case Coating											1.50	36.00	11.25	6.57	2.81	5.19		

NOTES

Actual hours of operation reported by the source as 22.5 hrs/day, 5 days/wk, and 50 weeks/yr, for a total of 5625 hours/yr. Additionally, Standard Locknut performs the priming operation for about 2/3 of the time in which the paint booth is used (approx. 15.0 hrs), and the finish painting consists of the remaining 1/3 of the time in which the paint booth is used (approx. 7.5 hrs).

Data for the above listed materials taken from Registration No.: R057-24233-00041, and from the Historic MSDSs on file in the Virtual File Cabinet.

The Volume % Water is assumed to be 1/2 of the Volume % Volatiles as taken from the MSDS, since the weight % water is approximately 1/2 of the Weight % Volatile (H2O & Organics).

The maximum usage for each coating in gallons per unit is 3.00 fluid ounces per casting, and the maximum throughput rate of the paint booth is 32 castings per hour.

There is only one spray gun used in this paint booth, so only one of the coatings can be applied at a time. The worst case coating for VOC is Gray Enamel and the worst case coating for particulate emissions is the Devflex Primer_Red.

The application method is air-assisted airless, and the source reports a transfer efficiency of 65%. Control is by dry filter.

Conversion Factors: 128 fluid ounces / 1 gallon and 3.7854118 liters = 128 fluid ounces

It is assumed that PM10 and PM2.5 emissions are each equal to PM emissions.

METHODOLOGY

Weight % Organics = Pounds VOC per gallon of coating / Density (Lb/Gal)

Weight % Water = Weight % Volatile (H2O & Organics) - Weight % Organics

Volume % Water = Volume % Volatiles from MSDS / 2.

Volume % Non-Volatiles (solids) = 100% - Volume % Volatiles from MSDS

Gal of Mat. (gal/unit) = Maximum Usage (fluid oz/unit) / Conversion Factor (fluid oz/gal)

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating taken from the MSDSs

* Pounds of VOC per Gallon Coating for Devflex 4020 PF Primer_Red = 80.27 grams per Liter / 453.59237 grams per pound * 3.7854118 liters

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 hrs/day)

Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (22.5 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)

Actual VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (5625 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations
Hazardous Air Pollutant (HAP) Emissions
from Surface Coating Operations
Spray Paint Booth (SPB2)**

Company Name: Standard Locknut, LLC
Source Address: 1045 East 169th Street, Westfield, Indiana 46074
Permit Number: M057-32013-00041
Permit Reviewer: Hannah L. Desrosiers

Material	Density (Lb/Gal)	Maximum Material Usage (gal/unit)	Maximum Throughput (unit/hour)	Weight % Xylene	Weight % Cobalt Compounds	Xylene Emissions (ton/yr)	Cobalt Compounds Emissions (ton/yr)	Total HAPs (ton/yr)
W/R Gray Enamel	8.81	0.0234	20	0%	0.70%	0	0.127	0.127
W/R Green A/D Enamel	8.78	0.0234	20	0%	0.70%	0	0.126	0.126
W/R Black A/D Enamel	8.82	0.0234	20	0%	0.70%	0	0.127	0.127
Devflex 4020 PF Primer_Red	11.28	0.0234	20	0.05%	0%	0.012	0	0.012
"Worst Case Coating" Individual HAP						0.01	0.13	
						"Worst Case Coating" Total HAPs		0.127

NOTES

The Devflex 4020 PF Primer_Red contains up to 5% medium aliphatic solvent naphtha (CAS 64742-88-7), which contains 1% xylenes. Reference: Table 1. Default Organic HAP Mass Fraction for Solvents and Solvent Blends (Source: 40 CFR 63).

The Glycol Ether (Ethylene Glycol Monobutyl Ether), counted as a HAP in the calculations for Registration No.:R057-24233-00041, has since been delisted by EPA.

METHODOLOGY

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

**Appendix A: Emissions Calculations
Volatile Organic Compound (VOC) and Particulate Emissions
from Surface Coating Operations
51 Dip Tanks**

Company Name: Standard Locknut, LLC
Source Address: 1045 East 169th Street, Westfield, Indiana 46074
Permit Number: M057-32013-00041
Permit Reviewer: Hannah L. Desrosiers

Material Used	Number of tanks	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Material Usage (gal/unit)	Maximum Throughput (units/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	Actual VOC pounds per day	Potential VOC tons per year	Actual VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Ferrocote 364 BF T1	each tank	6.61	61.15%	0.00%	61.15%	0.00%	40.60%	0.00056	20.54	4.04	4.04	0.05	1.11	1.04	0.20	0.13	0.00	9.96	100%
	43								883.22	4.04	4.04	1.98	47.60	44.62	8.69	5.58	0.00	9.96	100%
Rust Tek 262-CU	each tank	6.68	91.45%	0.00%	91.45%	0.00%	5.00%	0.00056	175.07	6.11	6.11	0.59	14.26	13.37	2.60	1.67	0.00	122.18	100%
	8								1,400.56	6.11	6.11	4.75	114.08	106.95	20.82	13.37	0.00	122.18	100%

State Potential Emissions (add worst case coating to all solvents) Total for all 51 tanks: 2,283.78 6.74 161.68 151.57 **29.51** 18.95 **0.00**

NOTES

Actual hours of operation reported by the source as 22.5 hrs/day, 5 days/wk, and 50 weeks/yr, for a total of 5625 hours/yr.
 The maximum material usage (gallons per unit) as provided by the source is 5,000 gallons of coating for 9,000,000 locknuts/year.
 The maximum throughput (units/hour) as provided by the source is 20.54 parts per hour through each Ferrocoate Tank, with a total of 43 tanks, and as 175.07 parts per hour through each Rust Tek Tank, with a total of 8 tanks. Combined total =
 The pounds VOC per gallon of coating less water, for the Ferrocoate 364 BF T1 was taken from the MSDS, as determined using EPA Method 24. The pounds VOC per gallon of coating less water for the Rust-Tek 262-CU was provided by the manufacturer.
 The transfer efficiency, from AP 40, pg. 859-861, is 100% for dip coating application methods.
 It is assumed that PM10 and PM2.5 emissions are each equal to PM emissions.

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)
 Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (22.5 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)
 Actual VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (5625 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
Hazardous Air Pollutant (HAP) Emissions
from Surface Coating Operations
51 Dip Tanks**

Company Name: Standard Locknut, LLC
Source Address: 1045 East 169th Street, Westfield, Indiana 46074
Permit Number: M057-32013-00041
Permit Reviewer: Hannah L. Desrosiers

Material Used	Number of tanks	Density (Lb/Gal)	Maximum Material Usage (gal/unit)	Maximum Throughput (unit/hour)	Weight % DGME	Weight % Toluene	DGME Emissions (ton/yr)	Toluene Emissions (ton/yr)
Ferrocote 364 BF T1	each tank	6.61	0.00056	20.54	5.00%	0.08%	0.02	2.64E-04
	43			883.22			0.71	0.01
Rust Tek 262-CU	each tank	6.68	0.00056	175.07	0.00%	0.10%	0	2.70E-03
	8			1,400.56			0	0.02

PTE of Individual HAP for all 51 tanks: 0.71 0.03
PTE of Total HAPs for all 51 tanks: 0.74

NOTES

The Ferrocote 364 BF T1 contains up to 80% severely hydrotreated light distillates (CAS 64742-47-8), which contain 0.1% toluene. Reference: Table 1. Default Organic HAP Mass Fraction for Solvents and Solvent Blends (Source: 40 CFR 63).

The Rust Tek 262-CU contains up to 95% petroleum distillates (CAS 64742-47-8), which contain 0.1% toluene. Reference: Table 1. Default Organic HAP Mass Fraction for Solvents and Solvent Blends (Source: 40 CFR 63).

DGME = Diethylene glycol monobutyl ether

METHODOLOGY

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

Appendix A: Emission Calculations
Volatile Organic Compound (VOC) and Particulate Emissions
from Machining Operations
Coolant Usage

Company Name: Standard Locknut, LLC
Source Address: 1045 East 169th Street, Westfield, Indiana 46074
Permit Number: M057-32013-00041
Permit Reviewer: Hannah L. Desrosiers

Material	Density (Lb/Gal)	Pounds VOC per gallon of coating less water (lbs/gal)	Weight % Organics	Number of Machines	Maximum Material Usage (replacement volume) (gal/hr)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Actual VOC (lbs/day)	Potential VOC (tons/year)	Actual VOC (tons/year)	Particulate Potential (tons/yr)	Transfer Efficiency
Semi-Kut 60 B	8.34	4.048	48.54%	each machine	0.017	0.07	1.61	1.51	0.29	0.19	0.00	100%
				85.0	1.41	5.70	136.79	128.24	24.96	16.03	0.00	

State Potential Emissions **Total for all 85 machines:** 5.70 136.79 128.24 **24.96** 16.03 **0.00**

NOTES

The coolant is flooded across the cutting surface, therefore the method of application is flow coating. The transfer efficiency, from AP 40, pg. 859-861, is 100% for flow coating application methods. Therefore, particulate emissions are assumed negligible.

The total annual material [coolant] usage was provided by the source as 15,840 gallons per year, with a replacement volume of 7,920 gal/yr, per 85 machines, based on an actual operating schedule of 22.5 hrs per workday, 5 days per week, and 50 weeks per year (5,625 hrs/yr). This has been converted to potential usage in gal/hr.

The "Pounds VOC per gallon of coating less water" supplied by the manufacturer.

According to the MSDS submitted by the source, the Semi-Kut 60 B coolant is water-based and 100% water soluble.

According to the MSDS submitted by the source, the specific gravity of this product is 1.0, that of water. Therefore, the density is equal to 8.34 lbs/gal.

According to the MSDS submitted by the source, the Semi-Kut 60 B is HAP-free.

It is assumed that PM10 and PM2.5 emissions are each equal to PM emissions.

METHODOLOGY

Maximum Material Usage (daily replacement volume) (gal/hr) = [Maximum Material Usage (daily replacement volume) (gal/yr) / (22.5 hrs/day * 5 days/wk * 50 weeks/yr)]

Weight % Organics = Pounds VOC per gallon of coating less water (lb/gal) / Density (lb/gal)

Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Maximum Material Usage (gal/hr)

Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Maximum Material Usage (gal/hr) * (24 hr/day)

Potential VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Maximum Material Usage (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential (tons/year) = (Pounds of VOC per Gallon coating (lb/gal) * Maximum Material Usage (gal/hr)) * Density (lbs/gal) * (1- Weight % Organics) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Dwight Beatty, Jr.
Standard Locknut, LLC
1045 East 169th Street
Westfield, IN 46074

DATE: January 28, 2013

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

SUBJECT: Final Decision
Minor Source Operating Permit
057-32013-00041

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:
Barry Grider, Responsible Official
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



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January 28, 2013

TO: Westfield Public Library

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

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

Applicant Name: Standard Locknut, LLC
Permit Number: 057-32013-00041

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 1/28/2013 Standard Locknut LLC 057-32013-00041 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

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											Remarks
1		Dwight Beatty Jr Standard Locknut LLC 1045 E 169th St Westfield IN 46074 (Source CAATS)									
2		Barry Grider Engineering Mgr Standard Locknut LLC 1045 E 169th St Westfield IN 46074 (RO CAATS)									
3		Hamilton County Health Department 18030 Foundation Dr. #A Noblesville IN 46060-5405 (Health Department)									
4		Westfield Public Library 333 W Hoover St Westfield IN 46074-9283 (Library)									
5		Hamilton County Board of Commissioners One Hamilton County Square Noblesville IN 46064 (Local Official)									
6		Westfield Town Council and Town Manager 130 Penn St. Westfield IN 46074 (Local Official)									
7		Glidden Fence Co. 17804 Spring Mill Rd Westfield IN 46074 (Affected Party)									
8		Environmental Field Services, Inc. 40 SR 32 W Westfield IN 46074 (Affected Party)									
9		Jill Butterfield 17903 Spring Mill Rd Westfield IN 46074 (Affected Party)									
10		Steven Newman 17922 Spring Mill Rd Westfield IN 46074 (Affected Party)									
11											
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