INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: January 15, 2014

RE: SCP Limited, Inc. / 033-33922-00107

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

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 6/13/2013

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Robert Baker
SCP Limited, Inc.
PO Box 560
Auburn, IN 46706

January 15, 2014

Re: 033-33922-00107
First Administrative Amendment to
M033-32010-00107

Dear Mr. Baker:

SCP Limited, Inc. was issued a Minor Source Operating Permit (MSOP) No. M033-32010-00107 on September 20, 2012 for a stationary igniter manufacturing facility, located at 1700 S. Indiana Ave., Auburn, Indiana. A letter requesting changes to this permit was received on November 26, 2013 to add an additional Billet Machining Operations, an electrically powered vacuum furnace, one electrically powered chiller unit for the vacuum furnace, and two electric powered automatic slicing machines. These units are similar to the existing units currently available at SCP Limited, Inc.

Pursuant to the provisions of 326 IAC 2-6.1-6(d)(8), an Administrative Amendment is hereby approved as described in the attached Administrative Amendment letter. Please find enclosed the entire amended permit document for final issuance.

New and Modify Emission Units and Pollution Control Devices

(1) One (1) Billet Machining Operations, identified as EU-45, constructed in 2014 including milling, cutting, and slicing activities for the shaping of billets, having a maximum process weight rate of 7.0 pounds per hour, equipped with a Torit Dust Collector to control particulate emissions, and exhausting inside the building.

(2) One (1) electrically powered vacuum furnace, identified as EU-40, constructed in 2000 and rebuilt in March 2014, uncontrolled, and exhausting outside the building through Vent V-4.

(3) One electrically powered chiller unit for vacuum furnace, identified as EU41, installed in 2014, uncontrolled and located outside the building.

(4) Two (2) electric powered automatic slicing machines, identified as EU42 and EU43, installed in 2014, with maximum throughput process rate of 500 pieces/hr per machine, equipped with a Torit dust collector, identified as EU-44, installed in 2014 to control particulate emissions, and exhausting inside the building.

Process/ Emission Unit	PTE of Proposed Modification (tons/year)									
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Billet Machining (EU45)	1.38	1.38	1.38	0	0	0	0	0	0	0
Electric Powered Vac . Furnace (EU40)	0	0	0	0	0	0	0	0	0	0
Slicing machines (EU42, EU43)	0.43	0.43	0.43	0	0	0	0	0	0	0
Electric Powered Chiller (EU 41)	0	0	0	0	0	0.01	0	0	0	0.01
Total PTE of Proposed Revision	1.81	1.81	1.81	0	0	0.01	0	0	0	0
negl. = negligible										

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the added emissions units are subject to 326 IAC 2-1.1-3 (Exemptions). These new units to be operated have the potential to emit less than five (5) tons per year of either PM, PM10, or direct PM2.5 and less than twenty-five (25) tons per year of VOC.

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Electric Arc Thermal Spraying	15.33	15.33	15.33	0	0	0	0	0	0.25	0.25 (nickel)
(2) Billet Machining *** **(EU31, EU45)**	~~39.51~~ **5.33**	~~39.51~~ **5.33**	~~39.51~~ **5.33**	0	0	0	0	0	0	NA
Abrasive Blasting	0.58	0.58	0.58	0	0	0	0	0	0	NA
Lamination Operations	0.03	0.03	0.03	0	0	0.01	0	0	$2.41E^{-03}$	$2.41E^{-03}$ (hexane)
Solvent Cleaning	0	0	0	0	0	17.96	0	0	0	NA
Boron Nitride Coating	$7.87E^{-04}$	$7.87E^{-04}$	$7.87E^{-04}$	0	0	0.09	0	0	0	NA
Natural Gas Combustion	0.02	0.06	0.06	0.005	0.81	0.04	0.68	979	0.02	0.015 (hexane)
Miscellaneous Activities□	10.00	10.00	10.00	0	0	5.00	0	0	< 2.50	< 2.50 (any)
Electric Vac . Furnace (EU40)	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
(2) Slicing machines (EU 42, EU 43)	**0.43**	**0.43**	**0.43**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Chiller (EU 41)	**0**	**0**	**0**	**0**	**0**	**0.01**	**0**	**0**	**0**	**0.01**
Total PTE of Entire Source	~~65.47~~ **31.73**	~~65.51~~ **31.77**	~~65.51~~ **31.77**	0.01	0.81	~~23.10~~ **23.11**	0.68	979	2.77	< 2.50 (any)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible 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 CO2e 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.

*** According to Pat Austin (IDEM) 12/27/2011 for every pound (max) of raw material introduced to the billet machining process approximately 50% are wasted (most for recovery). The Emission Factor (EF) for PM is based on the a mass balance study performed by the source to be 0.451 lb/lb of wasted material. It is within reasonable to assume that 10% PM will be discharged into atmosphere EF = 0.451 lb/lb x 10%= 0.0451. IDEM has determined that a test will not be required to confirm this emission factor M033-32010-00107 issued September 20, 2012.

□ A conservative estimate of emissions from the Miscellaneous Activities has been formed based on confidential information submitted by the source. The potential to emit any single HAP is estimated at less than 2.50 tons/yr and the potential to emit any combination of HAPs is estimated at less than 2.50 tons/yr.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, 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 MSOP (tons/year)									
	PM	PM10*	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Electric Arc Thermal Spraying	15.33	15.33	15.33	0	0	0	0	0	0.25	0.25 (nickel)
(2) Billet Machining *** (EU31, EU45)	5.33	5.33	5.33	0	0	0	0	0	0	NA
Abrasive Blasting	0.58	0.58	0.58	0	0	0	0	0	0	NA
Lamination Operations	0.03	0.03	0.03	0	0	0.01	0	0	$2.41E^{-03}$	$2.41E^{-03}$ (hexane)
Solvent Cleaning	0	0	0	0	0	17.96	0	0	0	NA
Boron Nitride Coating	$7.87E^{-04}$	$7.87E^{-04}$	$7.87E^{-04}$	0	0	0.09	0	0	0	NA
Natural Gas Combustion	0.02	0.06	0.06	0.005	0.81	0.04	0.68	979.34	0.02	0.015 (hexane)
Miscellaneous Activities$^{\alpha}$	10.00	10.00	10.00	0	0	5.00	0	0	< 2.50	< 2.50 (any)
Electric Powered Vac. Furnace (EU40)	0	0	0	0	0	0	0	0	0	0
(2) Slicing machines (EU 42, EU 43)	0.43	0.43	0.43	0	0	0	0	0	0	0
Electric Powered Chiller (EU 41)	0	0	0	0	0	0.01	0	0	0	0.01
Total PTE of Entire Source	31.73	31.77	31.77	0.005	0.81	23.11	0.68	979.34	2.77	< 2.50 (any)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible 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 CO2e 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.

*** According to Pat Austin (IDEM) 12/27/2011 for every pound (max) of raw material introduced to the billet machining process approximately 50% are wasted (most for recovery). The Emission Factor (EF) for PM is based on the a mass balance study performed by the source to be 0.451 lb/lb of wasted material. It is within reasonable to assume that 10% PM will be discharged into atmosphere EF = 0.451 lb/lb x 10%= 0.0451. IDEM has determined that a test will not be required to confirm this emission factor M033-32010-00107 issued September 20, 2012.

α A conservative estimate of emissions from the Miscellaneous Activities has been formed based on confidential information submitted by the source. The potential to emit any single HAP is estimated at less than 2.50 tons/yr and the potential to emit any combination of HAPs is estimated at less than 2.50 tons/yr.

a) This revision to an existing Minor Source Operating Permit stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria

pollutants from the entire source will still be limited to less than Title V major source threshold levels. Therefore, the source will still be subject to the provision of 326 IAC 2-6.1 (MSOP)

(b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAP will still be 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 provision of 326 IAC 2-7.

(c) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit greenhouse gases (GHGs) will still be 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 provision of 326 IAC 2-7.

(d) See Appendix A for the calculations

Federal Rule Applicability Determination

NSPS (40 CFR 60 and 326 IAC 12)

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60/Part 63) included for this proposed revision.

NESHAP (40 CFR 63 and 326 IAC 20)

(b) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

(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 modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from each new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

(e) 326 IAC 1-7 (Stack Height)
The potential to emit PM, PM10, and PM2.5, from the Billet Machining Operation, identified as EU45, are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 do not apply and are not included in Section C, of the permit. The source shall comply according to the provisions of 326 IAC 1-7-3.

Billet Machining & Slicing Machine

(f) 326 IAC 1-6-3 (Preventive Maintenance Plan (PMP))

(1) A control device is required to limit particulate emissions (PM/PM10/PM2.5) from the Billet Machining Operations, identified as EU45, for compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). Therefore a PMP is required for these units and their associated control devices.

(2) A control device is required to limit particulate emissions (PM/PM10/PM2.5) from the EU42 and EU43, for compliance with 326 IAC 2-6.1-5 (MSOP). Therefore a PMP is required for these units and their associated control devices.

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

(1) Billet Machining Operations, EU45 has potential particulate emissions of less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) the Billet Machining Operations, EU45 is exempt from 326 IAC 6-3, and the requirements are not included in the permit.

(2) The Slicing machines, EU42 and EU43 have potential particulate emissions of less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) the Slicing machine EU42 is exempt from 326 IAC 6-3, and the requirements are not included in the permit.

(h) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

(1) The electrical powered vacuum furnace, identified as EU40 does not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore, the requirements of 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units) do not apply, and are not included in this permit.

(i) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(j) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

A.2 Emission Units and Pollution Control Equipment Summary

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

...

(b) **Two (2)** Billet Machining Operations, identified as EU-31, constructed in 2011 **and EU-45, constructed in 2000, modified in 2014** including milling, cutting, and slicing activities for the shaping of billets, having a maximum process weight rate of 20.0 pounds per hour **and 7.0 pounds per hour, respectively**, equipped with a Torit Dust Collector to control particulate emissions, and exhausting inside the building.

...

(g) Emission units not regulated by a NESHAP, with potential uncontrolled emissions that are equal to or less than one (1) pound per day on an emission unit basis for any single HAP or combination of HAPs; and for which the potential uncontrolled emissions of PM10, NOx, SO2, VOCs, and CO are each equal to or less than one (1) pound per day; include:

...

(4) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.

(A) Two (2) electric powered automatic slicing machines, identified as EU42 and EU43, installed in 2014, with maximum throughput process rate of 500 pieces/hr per machine, equipped with a Torit dust collector, identified as EU-44, installed in 2014 to control particulate emissions, and exhausting inside the building.

(13) Electrically powered processes, including:

...

(B) ~~One (1)~~ **Two (2)** electrically powered vacuum furnace**s**, identified as EU-6, constructed in 2011 and **EU-40, constructed in 2000 and rebuilt in March 2014, both are** uncontrolled, and exhausting outside the building through Vent V-4.

Note: EU-6 and EU-41 there are no emissions because the system is self-contained and under vacuum.

...

(E) One electrically powered chiller unit for vacuum furnace, identified as EU41, installed in 2014, uncontrolled and located outside

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

(b) **Two (2)** Billet Machining Operations, identified as EU-31, constructed in 2011 **and EU-45, constructed in 2000, modified in 2014,** including milling, cutting, and slicing activities for the shaping of billets, having a maximum process weight rate of 20.0 pounds per hour and 7.0 pounds per hour, **respectively,** equipped with a Torit Dust Collector to control particulate emissions, and exhausting inside the building.

...

(d) Two (2) electric powered automatic slicing machines, identified as EU42 and EU43, installed in 2014, with maximum throughput process rate of 500 pieces/hr per machine, equipped with a Torit dust collector, identified as EU-44, installed in 2014 to control particulate emissions,

and exhausting inside the building.

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

...

Compliance Determination Requirements

D.1.3 Particulate Control

(b) In order to comply with Condition D.1.1, the Torit Dust Collector for particulate control shall be in operation and control emissions from the Billet Machining Operations **(EU31)**, including the milling, cutting, and slicing activities, at all times the Billet Machining Operations, including the milling, cutting, and slicing activities, are in operation.

...

All other conditions of the permit shall remain unchanged and in effect.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact Anh Nguyen, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Anh Nguyen or extension (3-5334), or dial (317) 233-5334.

Sincerely,

Tripurari P. Sinha, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments:
Updated Permit
PTE Calculations

TS/AN

cc: File - DeKalb County
DeKalb County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch

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

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

Minor Source Operating Permit
OFFICE OF AIR QUALITY

SCP Limited, Inc.
1700 S. Indiana Ave.
Auburn, Indiana 46706

(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.: M033-32010-00107	
Issued by: */ Original Signed by:* Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 20, 2012 Expiration Date: September 20, 2017

AA No.: 033-33922-00107	
Issued by: Tripurari Sinha Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: January 15, 2014 Expiration Date: September 20, 2017

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary igniter manufacturing facility.

Source Address:	1700 S. Indiana Ave., Auburn, Indiana 46706
General Source Phone Number:	(260) 925-2588
SIC Code:	3822 (Automatic Controls for Regulating Residential and Commercial Environments and Appliances)
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) Electric Arc Thermal Spraying Booth, identified as EU-27 (aka Flame Spray Booth), approved for construction in 2012, applying a maximum of 10.0 pounds of Nickel alloy wire per hour to metalize a maximum of 150 parts per hour, equipped with a Torit dust collector to control particulate emissions, and exhausting outside the building through stack V-11.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, electric arc thermal spraying booth EU-27 is considered an affected facility.

(b) Two (2) Billet Machining Operations, identified as EU-31, constructed in 2011 and EU-45, constructed in 2000, modified in 2014 including milling, cutting, and slicing activities for the shaping of billets, having a maximum process weight rate of 20.0 pounds per hour and 7.0 pounds per hour, respectively, equipped with a Torit Dust Collector to control particulate emissions, and exhausting inside the building.

(c) One (1) TRINCO Blast Cabinet, identified as EU-30, constructed in 2011, processing a maximum of one (1) cycle, 15 tiles (or 2.14 pounds of tiles), per 0.75 hours, equipped with an abrasive separator and filter bag to control particulate emissions, and exhausting inside the building.

(d) Lamination Operations, identified as EU-32, constructed in 2011, processing a maximum of 25 assemblies per hour, and applying a maximum of 0.011 oz of adhesive per assembly using hand-held aerosol spray cans, equipped with a HEPA filter to control particulate emissions, and exhausting inside the building.

(e) Solvent cleaning associated with the screen printing and lamination operations, using a maximum of 0.63 gal/hr, or 15 gal/day, of HAP-free solvent to hand-wipe clean the plates after use.

(f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

(1) One (1) natural gas-fired furnace for localized heating, identified as EU-1, constructed in 1995, with maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-1.

(2) One (1) natural gas-fired hot water heater, identified as EU-2, constructed in 1990, with maximum heat input capacity of 0.34 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-2.

(3) One (1) natural gas infrared space heating unit, identified as EU-7, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting through stack S-3.

(4) One (1) natural gas-fired furnace for localized heating, identified as EU-9, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through S-4.

(5) One (1) natural gas-fired furnace for localized heating, identified as EU-11, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-5.

(6) One (1) natural gas-fired life test chamber for pilot lights, identified as EU-12, constructed in 1990, with maximum heat input capacity of 0.04 MMBtu/hr, uncontrolled, and exhausting outside the building through S-6.

(7) One (1) natural gas-fired furnace for localized heating, identified as EU-13, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-7.

(8) One (1) natural gas-fired furnace for localized heating, identified as EU-14, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr. uncontrolled, and exhausting outside the building through stack S-8.

(9) One (1) natural gas-fired furnace for localized heating, identified as EU-16, constructed in 2011, with a maximum heat input capacity of 0.14 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-9.

(10) One (1) natural gas-fired pilot production tester, identified as EU-17, constructed in 1990, with a maximum throughput capacity of 136 parts per hour, and a maximum heat input capacity of 0.016 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-10.

(11) One (1) natural gas-fired pilot audit tester, identified as EU-18, constructed in 1990, with a maximum throughput capacity of 42 parts per hour, and a maximum heat input capacity of 0.006 MMBtu/hr, uncontrolled, and exhausting outside the building through vent V-8.

(12) One (1) natural gas-fired furnace for localized heating, identified as EU-19, constructed in 1990, with a maximum heat input capacity of 0.075 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-11.

(13) Two (2) natural gas-fired furnaces for localized heating, identified as EU-21 and 22, constructed in 1990, with a maximum heat input capacity of 0.105 MMBtu/hr, each, uncontrolled, and exhausting outside the building through stack S-12 and S-13.

(14) One (1) natural gas-fired furnace for localized heating, identified as EU-28, constructed in 2011, with a maximum heat input capacity of 0.30 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-14.

(15) One (1) natural gas-fired infrared space heating unit, identified as EU-29, constructed in 2007, with a maximum heat input capacity of 0.125 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-15.

(g) Emission units not regulated by a NESHAP, with potential uncontrolled emissions that are equal to or less than one (1) pound per day on an emission unit basis for any single HAP or combination of HAPs; and for which the potential uncontrolled emissions of PM10, NOx, SO2, VOCs, and CO are each equal to or less than one (1) pound per day; include:

(1) Four (4) resistance welders for fusion welding of mild and stainless steel, identified as EU-23 thru EU-26, constructed in 1990, uncontrolled, and exhausting outside the building through Vent V-10.

(2) Two (2) tweezer welders for attaching wires and braze leaf, identified as EU-34, constructed in 1990, uncontrolled, and exhausting inside the building

(3) One (1) laser machine for tile scribing, identified as EU-33, which does not produce fugitive emissions, is equipped with a dust collection device such as a bag filter, cyclone, or equivalent device, and exhausts inside the building.

(4) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.

(A) Two (2) electric powered automatic slicing machines, identified as EU42 and EU43, installed in 2014, with maximum throughput process rate of 500 pieces/hr per machine, equipped with a Torit dust collector, identified as EU-44, also installed in 2014 to control particulate emissions, and exhausting inside the building.

(5) Mold making operations, consisting of hand-mixing and hand-pouring water-based plaster, that contains less than or equal to five percent (5%) by volume of VOCs, excluding HAPs, and that is also HAP-free.

(6) Mold release agents using low volatile products (vapor pressure less than or equal to two (2) kilo Pascals measured at thirty-eight (38) degrees Centigrade).

(7) One (1) billet slurry mixing and casting operation, using a proprietary blend of ingredients that contain less than or equal to five percent (5%) by volume of VOCs, excluding HAPs, and that are also HAP-free. The ingredients are hand-loaded into a mixer unit, rolled until blended and hand-poured into molds.

(8) One (1) potting operation, identified as Potting, for the hand-mixing and hand-application of water-based ceramic adhesives containing less than or equal to five percent (5%) by volume of VOCs, excluding HAPs, and that are also HAP-free.

(9) One (1) boron nitride spray coating operation, consisting of applying a maximum of 0.0049 gal of boron nitride based, HAP-free paint per part using hand-held aerosol spray cans.

(10) Screen Printing Operations, identified as EU-32, constructed in 2011, including silk screening a maximum of 50 parts per hour using a proprietary blend of inks that

contain no VOCs or HAPs, equipped with a HEPA filter to control particulate emissions, and exhausting inside the building.

(11) Cleaning stamped metal terminals and laser scribed parts with acetone prior to assembly. This process, identified as EU-35, is uncontrolled and exhausts inside the building.

(12) Infrared cure equipment.

(13) Electrically powered processes, including:

(A) One (1) 30 ton, electrically powered, vacuum/hydraulic hot press, identified as EU-5, constructed in 2009, with a maximum throughput capacity of 15 parts per 12 hour cycle, uncontrolled, and exhausting outside the building through vent V-3.

(B) Two (2) electrically powered vacuum furnaces, identified as EU-6, constructed in 2011 and EU-40, constructed in 2000 and rebuilt in March 2014, both are uncontrolled, and exhausting outside the building through Vent V-4.

Note: EU-6 and EU-41 there are no emissions because the system is self-contained and under vacuum.

(C) One (1) high temperature electric (1200 °F) furnace used for binder burnout of ceramic material, identified as EU-15, constructed in 2011, uncontrolled and exhausting outside the building through Vent V-7.

(D) One (1) 50 hp Gardner-Denver electrically powered air compressor, identified as EU-10, constructed in 1990, uncontrolled, and exhausting outside the building through Vent V-6.

(E) One electrically powered chiller unit for vacuum furnace, identified as EU41, installed in 2014, uncontrolled and located outside the building.

(14) Manual loading and unloading operations.

(15) Activities performed using hand-held equipment, including the following:

(A)	Buffing.	(F)	Polishing.
(B)	Cutting, excluding cutting torches.	(G)	Routing.
(C)	Drilling.	(H)	Sanding.
(D)	Grinding.	(I)	Sawing.
(E)	Machining wood, metal, or plastic.	(J)	Surface grinding.

(h) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M033-32010-00107, 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 M033-32010-00107 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.

(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.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 Stack Height [326 IAC 1-7]

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.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3)

linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

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

C.9 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.10 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.11 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.12 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.13 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.14 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.15 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.16 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.17 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:

(a) One (1) Electric Arc Thermal Spraying Booth, identified as EU-27 (aka Flame Spray Booth), approved for construction in 2012, applying a maximum of 10.0 pounds of Nickel alloy wire per hour to metalize a maximum of 150 parts per hour, equipped with a Torit dust collector to control particulate emissions, and exhausting outside the building through stack V-11.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, electric arc thermal spraying booth EU-27 is considered an affected facility.

(b) Two (2) Billet Machining Operations, identified as EU-31, constructed in 2011 and EU-45, constructed in 2000, modified in 2014, including milling, cutting, and slicing activities for the shaping of billets, having a maximum process weight rate of 20.0 pounds per hour and 7.0 pounds per hour, respectively, equipped with a Torit Dust Collector to control particulate emissions, and exhausting inside the building.

(c) One (1) TRINCO Blast Cabinet, identified as EU-30, constructed in 2011, processing a maximum of one (1) cycle, 15 tiles (or 2.14 pounds of tiles), per 0.75 hours, equipped with an abrasive separator and filter bag to control particulate emissions, and exhausting inside 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 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), since the process weight rate from each of the processes listed in the table below is less than one hundred (100) pounds per hour, the allowable particulate emission rate shall not exceed the corresponding pound per hour limitations, as follows:

Emission Unit	Process Weight Rate (lbs/hr)	Allowable Particulate Emission Rate (lb/hour)
Electric Arc Thermal Spraying Booth	19.5	0.551
Billet Machining Operations EU 31	20.0	0.551

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

A Preventive Maintenance Plan is required for these facilities and their respective 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

(a) In order to comply with Condition D.1.1, the Torit Dust Collector for particulate control shall be in operation and control emissions from the Electric Arc Thermal Spraying Booth at all times the Electric Arc Thermal Spraying Booth is in operation.

(b) In order to comply with Condition D.1.1, the Torit Dust Collector for particulate control shall be in operation and control emissions from the Billet Machining Operations (EU31), including the milling, cutting, and slicing activities, at all times the Billet Machining Operations, including the milling, cutting, and slicing activities, are in operation.

(c) In order to comply with 326 IAC 2-6.1-5 (MSOP), the abrasive separator and filter bag for particulate control shall be in operation and control emissions from the TRINCO Blast Cabinet at all times the TRINCO Blast Cabinet is in operation.

(d) 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.1.4 Testing Requirements [326 IAC 2-6.1-5(a)(2)] [326 IAC 2-1.1-11]

Pursuant to Air-014-NPD and in order to verify compliance with 326 IAC 2-6.1-5, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)), and Condition D.1.1, the source shall perform a one-time performance test to verify the uncontrolled Nickel emission factor not later than 180 days after the initial startup of the Electric Arc Thermal Spraying Booth utilizing methods as approved by the Commissioner. 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 2-6.1-5(a)(2)]

D.1.5 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the Torit Dust Collector used in conjunction with the Electric Arc Thermal Spraying Booth, at least once per day when the Electric Arc Thermal Spraying Booth is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 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 and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) The Permittee shall record the pressure drop across the Torit Dust Collector used in conjunction with the Billet Machining Operation, at least once per day when the Billet Machining is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 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 and Exceedances contains the

Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(c) The Permittee shall record the pressure drop across the filter separator and dust collector used in conjunction with the TRINCO Blast Cabinet, at least once per day when the TRINCO Blast Cabinet is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 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 and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument 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.1.6 Broken or Failed Bag Detection

(a) For a single compartment dust collectors 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 C- Response to Excursions or Exceedances).

(b) For a single compartment dust collectors 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 or emissions unit, as appropriate. 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 C- Response to Excursions or Exceedances).

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

D.1.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.5(a), the Permittee shall maintain daily records of the pressure drop across the Torit Dust Collector controlling the Electric Arc Thermal Spraying Booth. 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).

(b) To document the compliance status with Condition D.1.5(b), the Permittee shall maintain daily records of the pressure drop across the Torit Dust Collector controlling the Billet Machining Operation. 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).

(c) To document the compliance status with Condition D.1.5(c), the Permittee shall maintain daily records of the pressure drop across the filter separator and dust collector controlling the TRINCO Blast Cabinet. 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).

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

SECTION E.1 NESHAP REQUIREMENTS

Emissions Unit Description: Electric Arc Thermal Spraying Booth

(a) One (1) Electric Arc Thermal Spraying Booth, identified as EU-27 (aka Flame Spray Booth), approved for construction in 2012, applying a maximum of 10.0 pounds of Nickel alloy wire per hour to metalize a maximum of 150 parts per hour, equipped with a Torit dust collector to control particulate emissions, and exhausting outside the building through stack V-11.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, electric arc thermal spraying booth EU-27 is considered an affected facility.

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

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.11130, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 1 of 40 CFR Part 63, Subpart WWWWWW in accordance with schedule in 40 CFR 63 Subpart WWWWWW.

(b) Pursuant to 40 CFR 63.12, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAPs): Area Source Standards for Plating and Polishing Operations [40 CFR 63, Subpart WWWWWW]

The Permittee, that owns or operates a plating and polishing facility, as defined in 40 CFR 63.11504, that is an area source of plating and polishing metal hazardous air pollutant (HAP) emissions, as defined in 40 CFR 63.11511, shall comply with the following provisions of 40 CFR Part 63, Subpart WWWWWW (included as Attachment A of this permit), with a compliance date of July 1, 2010:

(a) 40 CFR 63.11504(a)(1)(iii) & (iv),(2),(3)

(b) 40 CFR 63.11505(a)(2),(3), (c), (d), (e)

(c) 40 CFR 63.11506(c)

(d) 40 CFR 63.11507(e), (f), (g),

(e) 40 CFR 63.11508(a), (b), (c)(8),(10),(11), (d)(1),(2),(4)

(f) 40 CFR 63.11509(a)(1),(2),(4), (b)(1),(2), (c)(2)(ii),(iii),(7), (d), (e), (f)

(g) 40 CFR 63.11510

(h) 40 CFR 63.11511

(i) 40 CFR 63.11512

(j) Table 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:	SCP Limited, Inc.
Address:	1700 S. Indiana Ave.
City:	Auburn, Indiana 46706
Phone #:	(260) 925-2588
MSOP #:	M033-32010-00107

I hereby certify that SCP Limited, Inc. is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that SCP Limited, Inc. is :
- ☐ in compliance with the requirements of MSOP M033-32010-00107.
- ☐ not in compliance with the requirements of MSOP M033-32010-00107.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

Appendix A: Emissions Calculations
Emission Summary

Company Name: SCP Limited, Inc.
33-32010-00107 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Date of Issuance.: 9/20/2012
MPR No.: 033-33922-00107
Date: 11/26/2013
Reviewer: Anh Nguyen

Uncontrolled Potential Emissions (tons/year)

Category	Pollutant	New Billet Machining (EU45)	New slicing eqt (EU42, EU43)	New electric Vac Furn (EU41)	New electric *Chiller (EU41)	Total PTE of New Units	Electric Arc Thermal Spraying	Billet Machining (EU31)	Abrasive Blasting	Lamination Operations	Solvent Cleaning	Boron Nitride Coating Operation	Natural Gas Combustion (multiple units)	**** Mis. Activities (multiple units	PTE TOTAL
Criteria Pollutants	PM	1.38	0.43	0	0	1.82	15.33	3.95	0.58	0.03	0	7.87E-04	0.02	10.00	31.73
	PM10	1.38	0.43	0	0	1.82	15.33	3.95	0.58	0.03	0	7.87E-04	0.06	10.00	31.77
	PM2.5	1.38	0.43	0	0	1.82	15.33	3.95	0.58	0.03	0	7.87E-04	0.06	10.00	31.77
	SO2	0	0	0	0	0.00	0	0	0	0	0	0	0.005	0	0.00
	NOx	0	0	0	0	0.00	0	0	0	0	0	0	0.81	0	0.81
	VOC	0	0	0	0.005	0.01	0	0	0	0.01	17.96	0.09	0.04	5.00	23.11
	CO	0	0	0	0	0.00	0	0	0	0	0	0	0.68	0	0.68
	GHGs as CO2e	0	0	0	0	0.00	0	0	0	0	0	0	979	0	979
Hazardous Air Pollutants	Benzene	0	0	0	0	0.00	0	0	0	0	0	0	1.70E-05	***	0.00
	Dichlorobenzene	0	0	0	0	0.00	0	0	0	0	0	0	9.73E-06	***	0.00
	Formaldehyde	0	0	0	0	0.00	0	0	0	0	0	0	6.08E-04	***	0.00
	Hexane	0	0	0	0	0.00	0	0	0	0.002	0	0	0.015	***	0.02
	Toluene	0	0	0	0	0.00	0	0	0	0	0	0	2.76E-05	***	0.00
	Cadmium	0	0	0	0	0.00	0	0	0	0	0	0	8.92E-06	***	0.00
	Chromium	0	0	0	0	0.00	0	0	0	0	0	0	1.14E-05	***	0.00
	Lead	0	0	0	0	0.00	0	0	0	0	0	0	4.06E-06	***	0.00
	Manganese	0	0	0	0	0.00	0	0	0	0	0	0	3.08E-06	***	0.00
	Nickel	0	0	0	0	0.00	0.25	0	0	0	0	0	1.70E-05	***	0.25
	freon	0	0	0	0.005	0.01	0	0	0	0	0	0			0.01
	Totals	0.00	0.00	0.00	0.00	0.00	0.25	0	0	2.41E-03	0	0	0.02	< 2.50	2.77
												< 2.50			

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

* chiller 150 tons capacity is assumed to have 10lbs/yr recharge on R-22 (Chlorodifluoromethane or freon)

*** These activities include resistance welding, laser scribing, silk screening, hand mixing, mold making, casting, billet slurry mixing and casting, potting, binder burnout, manual loading and unloading operations, activities performed using hand-held equipment, and paved and unpaved parking lots, each of which meet the definition of an

**** A conservative estimate of emissions from the Miscellaneous Activities has been formed based on confidential information submitted by the source. The potential to emit any single HAP is estimated at less than 2.50 tons/yr and the potential to emit any combination of HAPs is estimated at less than 2.50 tons/yr.

ATSD Appendix A:Emission Calculations
Particulate (PM/PM10/PM2.5) Emissions
Billet Maching

Company Name: **SCP Limited, Inc.**
33-32010-00107 **1700 S. Indiana Ave., Auburn, IN 46706**
Op. Permit No.: **M033-32010-00107**
Date of Issuance.: **9/20/2012**
MPR No.: **033-33922-00107**
Date: **11/26/2013**
Reviewer: **Anh Nguyen**

Emission Unit	Maximum Throughput Rate (lbs/hr)	Uncontrolled PM Emission Factor [(1)] (lbs/lbs)	Uncontrolled PM Emissions* (lbs/hr)	Uncontrolled PTE of PM* (tons/yr)	Controlled PM Emissions* (lbs/hr)	Controlled PTE of PM* (tons/yr)	326 IAC 6-3 Process Weight Rate (lbs/hr)	326 IAC 6-3 Allowable PM Emissions (lbs/hr)
EU-45	7.0	0.045	0.32	1.38	0.02	0.07	7.0	< 0.551

METHODOLOGY

Uncontrolled PTE (lbs/hr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs of throughput)
Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs
Controlled PTE (lbs/hr) = Uncontrolled PTE (lbs/hr) * (1 - Torit Dust Collector Control Efficiency)
Controlled PTE (tons/yr) = Uncontrolled PTE (tons/yr) * (1 - Torit Dust Collector Control Efficiency)

NOTES

Total emissions based on rated capacity of 8,760 hours/year.
The machining operations are controlled by a Torit Dust Collector with a control efficiency of 95% or greater.
[(1)] According to Pat Austin (IDEM) 12/27/2011 For every 7 lbs (max) introduced to the billet machinig process approximately 50% are wasted (most for recovery) The Emissions for PM is based on the a mass balance study performed by the source to be 0.451 lb/lb of wasted material. It is reasonable to assume that 10% PM will be discharged into atmosphere EF = 0.451 lb/lb x 10%= 0.0451 lb/lb. IDEM has determined that a test will not be required to confirm this emission factor M033-32010-00107 issued September 20, 2012.
* In the absence of valid PM10 and PM2.5 emission factors, these emissions are assumed equal to PM emissions.

326 IAC 6-3-2(e) ALLOWABLE RATE OF EMISSIONS

When the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour. The source is able to comply with this limit using a control device.

Company Name: SCP Limited, Inc.
33-32010-00107 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Date of Issuance.: 9/20/2012
MPR No.: 033-33922-00107
Date: 11/26/2013
Reviewer: Anh Nguyen

Slicing machine EU42 & EU43

EU-42 & EU-43

	EU42		EU43	
*Maximum throughput process rate =	500		500	pc/hr
* Raw Material (Silicone Carbide) =	0.3		0.6	gr/pc
lbs equivalent =	453.6		453.6	gr
pound of material/pc =	0.0007	6-3-2	0.0013	lb/pc
Uncontrolled PM/PM10/PM2.5 =	0.03	< .551 lb/hr >	0.07	lb/hr
Uncontrolled PM/PM10/PM2.5 =	0.14	EU42 and	0.29	tons/yr
Torit dust control efficiency =	0.95	EU43 will	0.95	
Controlled PM/PM10/PM2.5 =	0.01	comply	0.01	tons/yr
Controlled PM/PM10/PM2.5 =	0.00		0.00	lb/hr

Methodology
*** Source provided - material cut is 0.3 gr/pc and very little dust mist are generated from the process; the Torit dust control efficiency is 95% .**

(1) The Emissions for PM is based on the a mass balance study performed by the source for the slicing machines . It is reasonable to assume that 10% uncontrolled PM emissions will be discharged into atmosphere. IDEM has determined that a test will not be required to confirm the emissions.

Uncontrolled PM/PM10/PM2.5 (lbs/hr) = Max. Throughput Rate (ea/hr) x raw material (g/pc) x Lb equivalent (lb/pc
Uncontrolled PTE (ton/yr) = Uncontrolled PM/PM10/PM2.5 (lbs/hr) x 8760 (hr/yr) x 1/2000 (ton/lb)
Controlled PM/PM10/PM2.5 (lb/hr) = Uncontrolled PM/PM10/PM2.5 (lbs/hr) x (1-Torit Dust Collector Control Efficiency)
Controlled PTE (tons/yr) = Uncontrolled PTE (tons/yr) * (1 - Torit Dust Collector Control Efficiency)

Appendix A: Emission Calculations
Particulate and Hazardous Air Pollutant (HAP) Emissions
from the Electric Arc Thermal Spraying Operation

Company Name: **SCP Limited, Inc.**
33-32010-00107 **1700 S. Indiana Ave., Auburn, IN 46706**
Op. Permit No.: **M033-32010-00107**
Date of Issuance.: **9/20/2012**
MPR No.: **033-33922-00107**
Date: **11/26/2013**
Reviewer: **Anh Nguyen**

Particulate (PM) Emissions

Material	Maximum Material Throughput Rate (lbs/hour)	Weight % Solids	Transfer Efficiency (%)	Uncontrolled PTE PM (lbs/hr)	Uncontrolled PTE PM (tons/year)	326 IAC 6-3 Process Weight Rate (lbs/hr)	326 IAC 6-3 Allowable PM Emissions (lbs/hr)
Wire	10.00	100%	65%	3.50	15.33	19.50	0.551

Control Efficiency =	98%	**98%**
Controlled PTE PM =	0.07	**0.31**

NOTES

PTE = Potential to Emit
Transfer efficiency assumed to be 65%
Control efficiency assumed to be 98%
PM, PM10, and PM 2.5 emissions are assumed equal (i.e., PM=PM10=PM2.5).

METHODOLOGY

Uncontrolled PTE PM (lbs/hr) = Max. Throughput Rate (lb/hour) * Weight % Solids * (1-Transfer Efficiency (%))
Uncontrolled PTE PM (tons/year) = Max. Throughput Rate (lb/hour) * Weight % Solids * 1 ton/2000 lbs * 8760 hrs/yr * (1-Transfer Efficiency (%))
Controlled PTE PM = Uncontrolled PTE PM * (1- Control Efficiency (%))

326 IAC 6-3-2(e) ALLOWABLE RATE OF EMISSIONS

When the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour. The source is able to comply with this limit using a control device.

Hazardous Air Pollutant (HAP) Emissions

Material	Maximum Material Throughput Rate (lbs/hour)	Weight % Nickel	Max. Throughput Nickel (lbs Ni sprayed/hr)	Emission Factor for Nickel* (lbs Ni/lbs Ni sprayed)	Uncontrolled PTE of Nickel (tons/yr)
Wire	10.00	95%	9.50	6.00E-03	0.25

Control Efficiency =	**98%**
Controlled PTE =	**0.005**

NOTES

PTE = Potential to Emit
* Uncontrolled Thermal Spraying Emission Factor for Nickel from Twin-Wire Electric Arc Spray taken from Title 17, California Code of Regulations, Section 93102.5, “Airborne Toxic Control Measure to Reduce Emissions of Hexavalent Chromium and Nickel from Thermal Spraying”, Appendix 1 – Emission Calculation Method, pages 21 through 23 of 35. (http://www.arb.ca.gov/regact/thermspr/finreg.pdf).

METHODOLOGY

Max. Throughput Nickel (lbs Ni sprayed/hr) = Maximum Material Throughput Rate (lbs/hour) * Weight % Nickel
Uncontrolled PTE of Nickel (tons/yr) = Max. Throughput Nickel (lbs/hr) * Emission Factor Nickel (lbs Ni/lbs Ni sprayed) * 8760 hrs/yr * 1 ton/2000 lbs

ATSD Appendix A:Emission Calculations
Particulate (PM/PM10/PM2.5) Emissions
From the Billet Machining Operations

Company Name: **SCP Limited, Inc.**
33-32010-00107 **1700 S. Indiana Ave., Auburn, IN 46706**
Op. Permit No.: **M033-32010-00107**
Date of Issuance.: **9/20/2012**
MPR No.: **033-33922-00107**
Date: **11/26/2013**
Reviewer: **Anh Nguyen**

Emission Unit	Maximum Throughput Rate (lbs/hr)	Uncontrolled PM Emission Factor [(1)] (lbs/lbs)	Uncontrolled PM Emissions* (lbs/hr)	Uncontrolled PTE of PM* (tons/yr)	Controlled PM Emissions* (lbs/hr)	Controlled PTE of PM* (tons/yr)	326 IAC 6-3 Process Weight Rate (lbs/hr)	326 IAC 6-3 Allowable PM Emissions (lbs/hr)
Billet Machining (EU31)	20.0	0.045	0.90	3.95	0.05	0.20	20.0	0.551

METHODOLOGY

Uncontrolled PTE (lbs/hr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs of throughput)
Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs
Controlled PTE (lbs/hr) = Uncontrolled PTE (lbs/hr) * (1 - Torit Dust Collector Control Efficiency)
Controlled PTE (tons/yr) = Uncontrolled PTE (tons/yr) * (1 - Torit Dust Collector Control Efficiency)

NOTES

Total emissions based on rated capacity of 8,760 hours/year.
The machining operations are controlled by a Torit Dust Collector with a control efficiency of 95% or greater.

[(1)] According to Pat Austin (IDEM) 12/27/2011 for every 20 lbs (max) introduced to the process approximately 50% are wasted (most for recovery). The Emission Factor (EF) for PM is based on the a mass balance study performed by the source to be 0.451 lb/lb of wasted material. It is within reasonable to assume that 10% PM will be discharged into atmosphere EF = 0.451 lb/lb x 10%= 0.0451lb/lb. IDEM has determined that a test will not be required to confirm this emission factor M033-32010-00107 issued September 20, 2012.

* In the absence of valid PM10 and PM2.5 emission factors, these emissions are assumed equal to PM emissions.

326 IAC 6-3-2(e) ALLOWABLE RATE OF EMISSIONS

When the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour. The source is able to comply with this limit using a control device.

Appendix A: Emission Calculations
Particulate Emissions from the
Abrasive Blasting and Billet Machining Operations

Company Name: SCP Limited, Inc.
33-32010-00107 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Date of Issuance.: 9/20/2012
MPR No.: 033-33922-00107
Date: 11/26/2013
Reviewer: Anh Nguyen

								PM Emissions		
Unit	**Unit ID**	**Time needed to process 1 cycle (hrs)**	**Number of tiles per cycle**	**Initial Mass of each tile (lbs)**	**Initial Mass of each cycle (lbs)**	**Final Mass of each tile (lbs)**	**Final Mass of each cycle (lbs)**	**Material Lost per cycle (lbs)**	**Material Lost per hour (lbs/hr)***	**Material Lost per year (tons/yr)**
TRINCO Blast Cabinet	EU-30	0.75	15	0.143	2.14	0.136	2.04	0.099	**0.132**	**0.58**

NOTES

The TRINCO Blast Cabinet is used to clean tiles. It takes 45 minutes, or 45/60 = 0.75 hours, to process a "cycle", and a maximum of 15 tiles can be processed per cycle.
The source conducted a mass balance study and has determined that a single tile initially weighed 64.66 grams, and then after being cleaned in the blasting cabinet weighed 61.66 grams. These values have been converted to pounds for the purposes of these calculations.
To form a conservative estimate, it is assumed that all material lost equals PM emissions.
PM, PM10, and PM 2.5 emissions are assumed equal (i.e., PM=PM10=PM2.5).

METHODOLOGY

Constants: 60 minutes = 1 hour, 1 gram = 0.0022046226218 pounds
Mass of each Tile (lbs) = [Mass of each Tile (grams) * (0.0022046226218 lbs/1 gram)]
Initial Mass of each cycle (lbs) = [Number of tiles per cycle * Initial Mass of each tile (lbs)]
Final Mass of each cycle (lbs) = [Number of tiles per cycle * Final Mass of each tile (lbs)]
Material Lost each cycle (lbs) = [Initial Mass of each cycle (lbs) - Final Mass of each cycle (lbs)]
Material Lost per hour (lbs/hr) = [(Material Lost per cycle (lbs) / Time needed to process 1 cycle (hrs)]
Material Lost per year (tons/yr) = [Material Lost per hour (lbs/hr) * (8760 hours / 1 year) * (2000 lbs / 1 ton)]

326 IAC 6-3-2(e) ALLOWABLE RATE OF EMISSIONS

*Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes where potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from 326 IAC 6-3.

Appendix A: Emission Calculations
Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emissions
from Adhesive Usage in the Lamination Operations

Company Name: **SCP Limited, Inc.**
33-32010-00107 **1700 S. Indiana Ave., Auburn, IN 46706**
Op. Permit No.: **M033-32010-00107**
Date of Issuance.: **9/20/2012**
MPR No.: **033-33922-00107**
Date: **11/26/2013**
Reviewer: **Anh Nguyen**

Material	Material Usage (lbs/unit)	Maximum Throughput Capacity (unit/hour)	Weight % Solids	Transfer Efficiency (%)	PM Emissions (lbs/hr)	PM Emissions (ton/yr)	Weight % VOCs	VOC Emissions (lbs/hr)	VOC Emissions (ton/yr)	Weight % Hexane	Hexane Emissions (lbs/hr)	Hexane Emissions (ton/yr)
Aerosol Spray Adhesive	0.0006875	50	60.0%	65%	0.01	**0.034**	8.6%	0.0030	**0.0129**	1.6%	0.0006	**0.0024**

NOTES
The VOC content less water and exempt solvents as reported on the MSDS is 468 g/l of coating. Converted, this becomes 3.91 pounds per gallon of coating.
This coating is applied by hand using an aerosol spray can. The transfer efficiency is assumed to be 65 %.
PM, PM10, and PM 2.5 emissions are assumed equal (i.e., PM=PM10=PM2.5).

METHODOLOGY
PM Emission rate (lbs/hr) = Material Usage (lbs/unit) * Maximum Throughput Capacity (unit/hour) * Weight % Solids * (1 - Transfer Efficiency (%))
PM Emission rate (tons/yr) = Material Usage (lbs/unit) * Maximum Throughput Capacity (unit/hour) * Weight % Solids * (1 - Transfer Efficiency (%)) * 8760 hrs/yr * 1 ton/2000 lbs
VOC/HAP Emission rate (lbs/hr) = Material Usage (lbs/unit) * Maximum Throughput Capacity (unit/hour) * Weight %
VOC/HAP Emission rate (tons/yr) = Material Usage (lbs/unit) * Maximum Throughput Capacity (unit/hour) * Weight % * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Volatile Organic Compound (VOC) Emissions
From the Solvent Cleaning associated with the Lamination Operation

Company Name: **SCP Limited, Inc.**
33-32010-00107 **1700 S. Indiana Ave., Auburn, IN 46706**
Op. Permit No.: **M033-32010-00107**
Date of Issuance.: **9/20/2012**
MPR No.: **033-33922-00107**
Date: **11/26/2013**
Reviewer: **Anh Nguyen**

Solvent Used	VOC content of Solvent (Density) (lbs/gal)	Daily Material Usage (daily replacement volume) (gal/workday)	Hours of Operation (hrs/workday)	Maximum Material Usage (gal/hr)	VOC PTE (tons/year)
2-Propanol	6.56	5.0	8.0	0.63	**17.96**

NOTES

The "Daily Material Usage" and "Hours of Operation" were provided by the source. Estimate is for 8760 hours of operation.
Based on the MSDS submitted by the source, the material being used does not contain any hazardous air pollutants.
The solvent is applied by hand using a rag; therefore, particulate emissions are determined negligible.

METHODOLOGY

Maximum Material Usage (gal/hr) = [Daily Material Usage (daily replacement volume) (gal/workday) / (Hour of Operation (hrs/workday))]
VOC PTE (tons/yr) = VOC Content (lbs/gal) * Maximum Material Usage (gal/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Volatile Organic Compound (VOC) Emissions
from the Boron Nitride Coating Operation

Company Name: **SCP Limited, Inc.**
33-32010-00107 **1700 S. Indiana Ave., Auburn, IN 46706**
Op. Permit No.: **M033-32010-00107**
Date of Issuance.: **9/20/2012**
MPR No.: **033-33922-00107**
Date: **11/26/2013**
Reviewer: **Anh Nguyen**

Material	Material Density (lbs/gal)	Maximum Material Usage (gal/hr)	Weight % Solids	Transfer Efficiency (%)	PM Emissions (lbs/hr)	PM Emissions (ton/yr)	Weight % VOCs	VOC Emissions (lbs/hr)	VOC Emissions (ton/yr)
Boron Nitride	4.59	0.0049	10.0%	65%	1.80E-04	**7.87E-04**	90.0%	0.020	**0.089**

NOTES

Maximum material usage provided by the source as 10.0 gal/yr. This has been converted to gal/hr using the assumption of 8 hrs/day, 5 days/wk, and 51 wks/yr (2040 hrs/yr).

The VOC content less water and exempt solvents as reported on the MSDS is 500-550 g/l of coating. Converted, this becomes 4.17 - 4.59 lbs/gal of coating.

Based on the MSDS submitted by the source, the material being used in this operation does not contain any hazardous air pollutants.

This coating is applied by hand using an aerosol spray can. The transfer efficiency is assumed to be 65%.

PM, PM10, and PM 2.5 emissions are assumed equal (i.e., PM=PM10=PM2.5).

METHODOLOGY

PM Emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % Solids * (1-Transfer Efficiency (%))
PM Emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % Solids * (1-Transfer Efficiency (%)) * 8760 hrs/yr * 1 ton/2000 lbs
VOC Emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % VOCs
VOC Emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % VOCs * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Criteria Pollutant and Hazardous Air Pollutant (HAP) Emissions
from Natural Gas Combustion (only)
MM BTU/HR <100

Company Name: **SCP Limited, Inc.**
33-32010-00107 **1700 S. Indiana Ave., Auburn, IN 46706**
Op. Permit No.: **M033-32010-00107**
Date of Issuance.: **9/20/2012**
MPR No.: **033-33922-00107**
Date: **11/26/2013**
Reviewer: **Anh Nguyen**

Combustion Source	# of units	Heat Input per unit (MMBtu/hr)	Total Heat Input (MMBtu/hr)
Furnaces (EU-1, EU-9, EU-11, EU-13, and EU-14)	5	0.100	0.50
Furnace (EU-16)	1	0.140	0.14
Furnace (EU-19)	1	0.075	0.08
Furnaces (EU-21 & EU-22)	2	0.105	0.21
Furnace (EU-28)	1	0.300	0.30
Hot water heater (EU-2)	1	0.340	0.34
740 life test chamber (EU-12)	1	0.040	0.04
740 pilot production tester (EU-17)	1	0.016	0.02
740 pilot audit tester (EU-18)	1	0.006	0.01
infrared space heater (EU-7)	1	0.100	0.10
infrared space heater (EU-29)	1	0.125	0.13
Total	16	1.35	**1.85**

Maximum Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.85	16.22

Criteria Pollutant Emissions

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.015	0.062	0.062	0.005	0.81	0.04	0.68

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

HAPs Emissions

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	0.08	1.80	3.40E-03
Potential Emission in tons/yr	1.70E-05	9.73E-06	6.08E-04	0.015	2.76E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	4.06E-06	8.92E-06	1.14E-05	3.08E-06	1.70E-05

Total HAPs =	0.015	tons/yr
Worst Single HA P =	0.015	tons/yr

NOTES
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
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).
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Greenhouse Gas Emissions
from Natural Gas Combustion (only)
MM BTU/HR <100

Maximum Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
0.00	1000	0.00

	Greenhouse Gases (GHGs)		
	CO2	**CH4**	**N2O**
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	973.41	0.02	0.02
Summed Potential Emissions in tons/yr	973.45		
CO2e Total in tons/yr	**979.34**		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Robert Baker
SCP Limited, Inc.
PO Box 560
Auburn, Indiana 46706

DATE: January 15, 2014

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

SUBJECT: Final Decision
MSOP – Administrative Amendment
033-33922-00107

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:
Jim Buchanan, Owner / SCP Limited, 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.

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	AWELLS 1/15/2014 SCP Limited Inc 033-33922-00107 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Robert Baker SCP Limited Inc 1700 S Indiana Ave Auburn IN 46706 (Source CAATS) confirmed delivery									
2		Jim Buchanan Owner SCP Limited Inc PO Box 560 Auburn IN 46706 *(RO CAATS)*									
3		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 *(Affected Party)*									
4		DeKalb County Commissioners 100 South Main Street Auburn IN 46706 *(Local Official)*									
5		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 *(Affected Party)*									
6		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 *(Affected Party)*									
7		Auburn City Council and Mayors Office P.O. Box 506 Auburn IN 46706-0506 *(Local Official)*									
8		Dekalb County Health Department 220 E 7th St #110 Auburn IN 46706 *(Health Department)*									
9		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 *(Affected Party)*									
10		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 *(Affected Party)*									
11		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 *(Affected Party)*									
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
10			

FACSIMILIE OF PS Form 3877