



# 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: December 19, 2013

RE: Itsuwa USA, LLC / 005-33957-00100

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

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Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

Akira Hayashi  
Itsuwa USA, LLC  
1349 Arcadia Drive  
Columbus, Indiana 47201

December 19, 2013

Re: R 005-33957-00100  
First Administrative Amendment to  
R005-27721-00100

Dear Akira Hayashi:

CAPCO, LLC was issued a Registration No. R005-27721-00100 on June 3, 2009 for a stationary automotive metal stamping parts manufacturer located at 1349 Arcadia Drive, Indiana 47201. On December 10, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to:

- (1) Change the name of the company from CAPCO, LLC to Itsuwa USA, LLC;
- (2) Add a shot blast machine; and
- (3) Add existing natural gas space heaters.

Pursuant to 326 IAC 2-5.5-6(d)(3), the name change in the registration is considered an administrative amendment because the registration is amended to indicate a change in a company name of the source.

Pursuant to 326 IAC 2-5.5-6(d)(11), the addition of the shot blast machine and natural gas space heaters to the registration is considered administrative amendment because the registration is amended to incorporate a modification that consist of emission unit described under 326 IAC 2-1.1-3(e)(1) through 326 IAC 2-1.1-3(e)(31).

The modification consists of the addition of the following emissions units:

One (1) shot blasting machine, identified as EU-4, approved for construction in 2013, with a maximum rate of 115 pounds of granular compounds per hour, using cartridge for particulate control, and exhausting inside.

The PTE of the modification is as follows:

Process/ Emission Unit	PTE of Proposed Modification (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Shot Blasting	0.17	0.17	0.17	-	-	-	-	-	-	-
Total PTE of Modification	<b>0.17</b>	<b>0.17</b>	<b>0.17</b>	-	-	-	-	-	-	-

- (a) The uncontrolled/unlimited potential to emit of the entire source after the addition of this emission unit will continue to be within the threshold levels specified in 326 IAC 2-5.5-1(b)(1) (Registration). (See Appendix A for the calculations).



A State that Works

- (b) No new state rules are applicable to this source due to the addition of the emission unit. The potential to emit of this shot blasting is less than 0.551 pound per hour; therefore, it is exempted from the 326 IAC 6-3 requirements.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) or National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this administrative amendment.

**PTE of the Entire Source Prior to this Registration Administrative Amendment**

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Solvent Cleaning Machine (EU-1)	-	-	-	-	-	9.29	-		
Electrodeposition Coating Line (EU-2)	-	-	-	-	-	4.87	-		
Surface Booth (EU-3)	0.49	0.49	0.49	-	-	2.26	-	1.01	0.51
Natural Gas Combustion	0.045	0.18	0.18	0.014	2.41	0.13	2.02	0.05	0.04
<b>Total PTE of Entire Source</b>	<b>0.54</b>	<b>0.67</b>	<b>0.67</b>	<b>0.014</b>	<b>2.41</b>	<b>16.55</b>	<b>2.02</b>	<b>1.06</b>	
Registration Levels	25	25	25	25	25	25	100	25	10

Note: The above table is from R005-27721-00100, issued on June 3, 2009.

**PTE of the Entire Source After Issuance of the Registration Administrative Amendment**

The table below summarizes the potential to emit of the entire source after the issuance of this administrative amendment, reflecting all limits, of the emission units, using **bold** and ~~strikeouts~~ to show the changes:

Process/ Emission Unit	Potential To Emit of the Entire Source with the Revision (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Solvent Cleaning (EU-1)	-	-	-	-	-	9.29	-	-	-	-
Electrodeposition Coating (EU-2)	-	-	-	-	-	4.87	-	-	-	-
Surface Coating (EU-3)	0.49	0.49	0.49	-	-	0.38	-	-	1.01	0.51
<b>Shot Blasting</b>	<b>0.17</b>	<b>0.17</b>	<b>0.17</b>	-	-	-	-	-	-	-
Natural Gas Combustion	<del>0.05</del> <b>0.02</b>	<del>0.18</del> <b>0.10</b>	<del>0.18</del> <b>0.10</b>	0.01	<del>2.41</del> <b>1.25</b>	<del>0.13</del> <b>0.07</b>	<del>2.02</del> <b>1.05</b>	<b>1,512.36</b>	<del>0.05</del> <b>0.02</b>	<del>0.04</del> <b>0.02</b>
<b>Total PTE of Entire Source</b>	<b>0.54</b>	<b>0.67</b>	<b>0.67</b>	0.01	<b>2.41</b>	<b>14.67</b>	<b>2.02</b>	<b>1,512.36</b>	<b>1.064</b>	<b>0.51</b>
Registration Levels	25	25	25	25	25	25	100	<b>100,000</b>	25	10

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

\*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

See Appendix A for the calculations.

The table below summarizes the potential to emit of the entire source after issuance of this administrative amendment, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source with the Revision (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Solvent Cleaning (EU-1)	-	-	-	-	-	9.29	-	-	-	-
Electrodeposition Coating (EU-2)	-	-	-	-	-	4.87	-	-	-	-
Surface Coating (EU-3)	0.49	0.49	0.49	-	-	0.38	-	-	1.01	0.51
Shot Blasting	0.17	0.17	0.17	-	-	-	-	-	-	-
Natural Gas Combustion	0.02	0.10	0.10	0.01	1.25	0.07	1.05	1,512.36	0.02	0.02
<b>Total PTE of Entire Source</b>	<b>0.69</b>	<b>0.76</b>	<b>0.76</b>	<b>0.01</b>	<b>1.25</b>	<b>14.61</b>	<b>1.05</b>	<b>1,512.36</b>	<b>1.04</b>	<b>0.51</b>
<b>Registration Levels</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>100</b>	<b>100,000</b>	<b>25</b>	<b>10</b>

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
 \*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

Pursuant to 326 IAC 2-5.5-6, the registration is hereby amended as follows:

- (1) The company name has been revised throughout the registration.
- (2) The shot blast machine and the natural gas heaters have been added in Section A.2 Emission Units and Pollution Control Equipment Summary.
- (3) IDEM, OAQ has decided to make the following additional changes to the registration:
  - (a) The source mailing address has been removed. IDEM, OAQ will continue to maintain records of the mailing address.
  - (b) The description of SIC code has been added for clarification.
  - (c) Condition D.1.1 has been revised according to the rule revision in 2013, and D.1.2 has been removed since the requirements have been repealed.
  - (d) The greenhouse gases (GHGs) emissions have been added. Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit (PTE) 100,000 tons per year or more of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e). Therefore, CO<sub>2</sub>e emissions have been calculated for this source. Based on the calculations, the unlimited PTE GHGs from the entire source is less than 100,000 tons of CO<sub>2</sub>e per year (see Appendix A for the calculations). This did not require any changes to the registration.

The registration has been amended as follows with deleted language as strikeouts and new language **bolded**:

Company Name: ~~CAPCO, LLC~~  
**Itsuwa USA LLC**

A.1 General Information

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The Registrant owns and operates an automotive metal stamping parts manufacturer.

Source Address: 1349 Arcadia Drive, Indiana 47201  
Mailing Address: 1349 Arcadia Drive, IN 47201  
General Source Phone Number: (812) 375-1700  
SIC Code: 3469 (**Metal Stampings, Not Elsewhere Classified**)  
....

A.2 Emission Units and Pollution Control Equipment Summary

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.....

- (d) **One (1) shot blasting machine, identified as EU-4, approved for construction in 2013, with a maximum rate of 115 pounds of granular compounds per hour, using cartridge for particulate control, and exhausting inside.**
- (e) **Miscellaneous natural gas space heaters for warehouses and offices, with total heat input rate of 2.86 MMBtu per hour**

~~D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-4]~~

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~~Pursuant to 326 IAC 8-3-4 (Conveyorized Degreaser Operation), for conveyorized degreasing operations constructed after January 1, 1980, the Permittee shall:~~

- ~~(a) Minimize carryout emissions by:
  - ~~(1) Racking parts for best drainage;~~
  - ~~(2) Maintaining the vertical conveyor speed at less than 3.3 meters per minute (eleven (11) feet per minute);~~~~
- ~~(b) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;~~
- ~~(c) Repair solvent leaks immediately, or shut down the degreaser;~~
- ~~(d) Not use workplace fans near the degreaser opening;~~
- ~~(e) Not allow water in solvent exiting the water separator; and~~
- ~~(f) Provide a permanent, conspicuous label summarizing the operating requirements.~~

~~D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-7]~~

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~~Pursuant to 326 IAC 8-3-7(a) (Conveyorized Degreaser Operation and Control), for conveyorized degreasing operations with an air to solvent interface of twenty-one and six-tenths (21.6) square feet or greater, constructed after July 1, 1990:~~

- (a) ~~The Permittee shall ensure that the following control equipment requirements are met:~~
- (1) ~~Equip the degreaser's entrances and exits with downtime covers which are closed when the degreaser is not operating.~~
  - (2) ~~Equip the degreaser with the following switches:~~
    - (A) ~~A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.~~
    - (B) ~~A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).~~
    - (C) ~~A vapor level control thermostat which shuts off sump heat when vapor level rises more than ten (10) centimeters (four (4) inches).~~
  - (3) ~~Equip the degreaser with entrances and exits which silhouette workloads in such a manner that the average clearance between the articles and the degreaser opening is either less than ten (10) centimeters (four (4) inches) or less than ten percent (10%) of the width of the opening.~~
  - (4) ~~Equip the degreaser with a drying tunnel, rotating or tumbling basket, or other equipment which prevents cleaned articles from carrying out solvent liquid or vapor.~~
  - (5) ~~Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~
  - (6) ~~Equip the degreaser with one (1) of the following control devices:~~
    - (A) ~~A refrigerated chiller;~~
    - (B) ~~A carbon adsorption system with ventilation which, with the downtime covers open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle; or~~
    - (C) ~~Other systems of demonstrated equivalent or better control as those outlined in clause (A) or (B). Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

**D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-4]**

**Pursuant to 326 IAC 8-3-4 (Conveyorized Degreaser Operation), for conveyorized degreasing operations constructed after January 1, 1980, the owner or operator of:**

- (a) **a conveyorized degreaser shall ensure the following control equipment and operating requirements have been met:**
  - (1) **Minimize carryout emissions by:**
    - (A) **racking parts for optimal drainage; and**
    - (B) **maintaining the vertical conveyor speed at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute).**

- (2) Store waste solvent only in closed containers.**
  - (3) Prohibit the disposal or transfer of waste solvent in a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.**
  - (4) Repair solvent leaks immediately, or shut down the degreaser if leaks cannot be repaired immediately.**
  - (5) Prohibit the use of workplace fans near the degreaser opening.**
  - (6) Prohibit visually detectable water in the solvent from exiting the water separator.**
  - (7) Equip the degreaser with a permanent, conspicuous label that lists the operating requirements in subdivisions (1) through (6).**
- (b) a conveyORIZED degreaser subject to this subsection shall ensure the following control equipment and operating requirements are met:**
- (1) Equip the degreaser's entrances and exits with downtime covers that are closed when the degreaser is not operating.**
  - (2) Equip the degreaser with the following switches:**
    - (A) A condenser flow switch and thermostat that shuts off sump heat if condenser coolant stops circulating or becomes too warm.**
    - (B) A spray safety switch that shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).**
    - (C) A vapor level control thermostat that shuts off sump heat when vapor level rises more than ten (10) centimeters (four (4) inches).**
  - (3) Equip the degreaser with entrances and exits that silhouette workloads in such a manner that the average clearance between the articles and the degreaser opening is either less than ten (10) centimeters (four (4) inches) or less than ten percent (10%) of the width of the opening.**
  - (4) Equip the degreaser with a drying tunnel, rotating or tumbling basket, or other equipment that prevents cleaned articles from carrying out solvent liquid or vapor.**
  - (5) Equip the degreaser with one (1) of the following control devices:**
    - (A) A refrigerated chiller.**
    - (B) A carbon adsorption system with ventilation that, with the downtime covers open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air-to-solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.**
    - (C) An alternative system of demonstrated equivalent or better control as those outlined in clause (A) or (B) that is approved by the**

department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (6) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser opening unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
- (7) Cover entrances and exits at all times except when processing workloads through the degreaser.
- (8) Ensure that the label required under subsection (a)(7) includes the additional operating requirements listed in subdivisions (6) and (7).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY

<b>Company Name:</b>	<del>CAPCO, LLC</del> Itsuwa USA LLC
<b>Address:</b>	1349 Arcadia Drive
<b>City:</b>	Columbus, Indiana 47201
<b>Phone Number:</b>	(812) 375-1700
<b>Registration No.:</b>	R005-27721-00100

I hereby certify that ~~Itsuwa USA, LLC~~ **Itsuwa USA LLC**  
is :

still in operation.

no longer in operation.

I hereby certify that ~~Itsuwa USA, LLC~~ **Itsuwa USA LLC**  
is :

in compliance with the requirements  
of Registration No. R005-27721-00100.

not in compliance with the requirements  
of Registration No. R005-27721-00100.

The source shall continue to operate according to 326 IAC 2-5.5 (Registrations). Please find enclosed the amended registration and Appendix A. A copy of the registration is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.  
If you have any questions on this matter, please contact Ms. Renee Traivaranon, at (800) 451-6027,  
press 0 and ask for extension 4-5615, or dial (317) 234-5615.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/rt

Attachments: Revised Registration  
Appendix A Calculations

cc: File - Bartholomew County  
Bartholomew County Health Department  
Compliance and Enforcement Branch  
Kimberly K. Thompson, Itsuwa USA, LLC,  
1349 Arcadia Dr., Columbus, IN 47201



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Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

## REGISTRATION OFFICE OF AIR QUALITY

**Itsuwa USA LLC  
1349 Arcadia Drive  
Columbus, Indiana 47201**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R005-27721-00100	
Issued by: <i>Original Signed by</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 3, 2009

First Registration Administrative Amendment No. 005-33957-00100	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 19, 2013

## SECTION A

## SOURCE SUMMARY

This registration 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 Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

### A.1 General Information

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The Registrant owns and operates an automotive metal stamping parts manufacturer.

Source Address:	1349 Arcadia Drive, Indiana 47201
General Source Phone Number:	(812) 375-1700
SIC Code:	3469 (Metal Stampings, Not Elsewhere Classified)
County Location:	Bartholomew County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Solvent Cleaning Machine, identified as EU-1, installed in July 2001, with a maximum capacity of five (5) gallons per day, using no control equipment, and exhausting to stack S1.
- (b) One (1) Electrodeposition coating operation, identified as EU-2, approved for construction in 2009, coating metal parts for automotive industry, with a maximum capacity of 5.5 gallons per hour, using no control equipment, and exhausting indoors.
- (c) One (1) surface coating booth, identified as EU-3, used to coat metal parts for the automotive industry, with a maximum rate of 50 parts per hour, uses one (1) high volume low pressure (HVLP) spray applicator. Particulate emissions are controlled using a dry filter, which exhausts internally. The booth was approved for construction in 2009.
- (d) One (1) shot blasting machine, identified as EU-4, approved for construction in 2013, with a maximum rate of 115 pounds of granular compounds per hour, using cartridge for particulate control, and exhausting inside.
- (e) Miscellaneous natural gas space heaters for warehouses and offices, with total heat input rate of 2.86 MMBtu per hour

## SECTION B

## GENERAL CONDITIONS

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

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Terms in this registration 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 Effective Date of Registration [IC 13-15-5-3]

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Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

### B.3 Registration Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (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 registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

### B.4 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

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Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (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 registration.
- (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, IN 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.5 Source Modification Requirement [326 IAC 2-5.5-6(a)]

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Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

**B.6 Registrations [326 IAC 2-5.1-2(i)]**

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Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

#### C.1 Opacity [326 IAC 5-1]

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

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

## SECTION D.1

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One Solvent Cleaning Machine, identified as EU-1, installed in July 2001, with a maximum capacity of five (5) gallons per day, using no control equipment, and exhausting to stack S1.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-4]

Pursuant to 326 IAC 8-3-4 (Conveyorized Degreaser Operation), for conveyorized degreasing operations constructed after January 1, 1980, the owner or operator of:

- (a) a conveyorized degreaser shall ensure the following control equipment and operating requirements have been met:
- (1) Minimize carryout emissions by:
    - (A) racking parts for optimal drainage; and
    - (B) maintaining the vertical conveyor speed at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute).
  - (2) Store waste solvent only in closed containers.
  - (3) Prohibit the disposal or transfer of waste solvent in a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
  - (4) Repair solvent leaks immediately, or shut down the degreaser if leaks cannot be repaired immediately.
  - (5) Prohibit the use of workplace fans near the degreaser opening.
  - (6) Prohibit visually detectable water in the solvent from exiting the water separator.
  - (7) Equip the degreaser with a permanent, conspicuous label that lists the operating requirements in subdivisions (1) through (6).
- (b) The owner or operator of a conveyorized degreaser subject to this subsection shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser's entrances and exits with downtime covers that are closed when the degreaser is not operating.
  - (2) Equip the degreaser with the following switches:
    - (A) A condenser flow switch and thermostat that shuts off sump heat if condenser coolant stops circulating or becomes too warm.

- (B) A spray safety switch that shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
- (C) A vapor level control thermostat that shuts off sump heat when vapor level rises more than ten (10) centimeters (four (4) inches).
- (3) Equip the degreaser with entrances and exits that silhouette workloads in such a manner that the average clearance between the articles and the degreaser opening is either less than ten (10) centimeters (four (4) inches) or less than ten percent (10%) of the width of the opening.
- (4) Equip the degreaser with a drying tunnel, rotating or tumbling basket, or other equipment that prevents cleaned articles from carrying out solvent liquid or vapor.
- (5) Equip the degreaser with one (1) of the following control devices:
  - (A) A refrigerated chiller.
  - (B) A carbon adsorption system with ventilation that, with the downtime covers open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air-to-solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
  - (C) An alternative system of demonstrated equivalent or better control as those outlined in clause (A) or (B) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (6) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser opening unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
- (7) Cover entrances and exits at all times except when processing workloads through the degreaser.
- (8) Ensure that the label required under subsection (a)(7) includes the additional operating requirements listed in subdivisions (6) and (7).

## SECTION D.2

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (b) Electrodeposition coating operation, identified as EU-2, approved for construction in 2009, coating metal parts for automotive industry, with a maximum capacity of 5.5 gallons per hour, using no control equipment, and exhausting indoors.
- (c) One (1) surface coating booth, identified as EU-3, used to coat metal parts for the automotive industry, with a maximum rate of 50 parts per hour, uses one (1) high volume low pressure (HVLP) spray applicator. Particulate emissions are controlled using a dry filter, which exhausts internally. The booth was approved for construction in 2009.

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

### Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

#### D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9(d)(4), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three (3) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

### Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

#### D.2.2 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

#### D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in condition D.2.1.
  - (1) The VOC content of each coating material and solvent used less water.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**REGISTRATION  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	Itsuwa USA, LLC
<b>Address:</b>	1349 Arcadia Drive
<b>City:</b>	Columbus, Indiana 47201
<b>Phone Number:</b>	(812) 375-1700
<b>Registration No.:</b>	R005-27721-00100

I hereby certify that Itsuwa USA, LLC is:

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. R005-27721-00100.
- not in compliance with the requirements of Registration No. R005-27721-00100.

I hereby certify that Itsuwa USA, LLC is:

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Phone Number:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**Appendix A: Emission Calculations**

**Summary**

**Company Name:** Itsuwa USA, LLC  
**Address City IN Zip:** 1349 Arcadia Drive, Columbus, IN 47201  
**Permit Number:** R005-2771-00100  
**Administrative Amendment No.:** R005-33957-00100  
**Reviewer:** Renee Traivaranon  
**Date:** December 10, 2013

Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	CO <sub>2</sub> e	Single HAP	Combine HAPS
Solvent Cleaning (EU-1)	-	-	-	-	-	9.29	-	-	-	-
Electrodeposition Coating (EU-2)	-	-	-	-	-	4.87	-	-	-	-
Surface Coating (EU-3)	0.49	0.49	0.49	-	-	0.38	-	-	0.51	1.01
Shot Blasting	0.17	0.17	0.17	-	-	-	-	-	-	-
Natural Gas Combustion	0.02	0.10	0.10	0.01	1.25	0.07	1.05	1512.36	0.02	0.02
<b>Total</b>	<b>0.69</b>	<b>0.76</b>	<b>0.76</b>	<b>0.01</b>	<b>1.25</b>	<b>14.61</b>	<b>1.05</b>	<b>1512.36</b>	<b>0.51</b>	<b>1.04</b>

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Solvent Cleaning Operations**

**Company Name:** Itsuwa USA, LLC  
**Address City IN Zip:** 1349 Arcadia Drive, Columbus, IN 47201  
**Permit Number:** R005-2771-00100  
**Administrative Amendment No.:** R005-33957-00100  
**Reviewer:** Renee Traivaranon  
**Date:** December 10, 2013

Material	Density (Lb/Gal)	VOC Content (wt%)	Actual Solvent Consumption at 4,000 hours a year (gals/yr)*	PTE Solvent Consumption (gals/yr)	PTE (tons/year)
Actrel 3360L	6.43	100.00%	1320.00	2890.80	9.29

\* Information provided by the source.

**Methodology:**

PTE VOC = (Density lbs/gal)\*(VOC content Wt%)\*(1320 gal/4000 hours per year)\* 8760 hours per year)\*(1/2000 tons/lbs)





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

**Company Name: Itsuwa USA, LLC**  
**Address City IN Zip: 1349 Arcadia Drive, Columbus, IN 47201**  
**Permit Number: R005-2771-00100**  
**Administrative Amendment No.: R005-33957-00100**  
**Reviewer: Renee Traivaranon**  
**Date: December 10, 2013**

Material	Density (Lb/Gal)	Max Coating Usage (lbs/day) <sup>1</sup>	Weight % Xylene	Weight % Toluene	Xylene Emissions (lbs/day)	Xylene Emissions (ton/yr)	Toluene Emissions (lbs/day)	Toluene Emissions (ton/yr)
Epolac Coating	9.41	13.86	10.00%	20.00%	1.39	0.25	2.77	0.51
Epolac Thinner	7.58	4.62	30.00%	0.00%	1.39	0.25	-	-

**Total**

Total State Potential Emissions **0.51**      **0.51**      **1.01**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Max Coating Usage per day \* Weight % HAP \* 365days/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations**

**Company Name: Itsuwa USA, LLC**  
**Address City IN Zip: 1349 Arcadia Drive, Columbus, IN 47201**  
**Permit Number: R005-2771-00100**  
**Administrative Amendment No.: R005-33957-00100**  
**Reviewer: Renee Traivaranon**  
**Date: December 10, 2013**

Facility	Maximum Capacity (lbs/hr)	Emission Factor (lb/ton)	Potential to emit	
			PM/PM10/PM2.5	
			(lbs/hr)	(tons/year)
Shot blasting	115.0	0.69	0.04	0.2

**326 IAC 6-3-2 Allowable Rate of Emissions**

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Limit 326 IAC 6-3-2 (lbs/hr)
Shot blasting	0.06	0.6

**Methodology**

Emission Factor from AP42, abrasive blasting (SCC 3-095-002-04) Table 13.2.6-1 (9/97).  
 Assumption PM=PM10=PM2.5

Potential Emissions of PM/PM10/PM2.5 (lb/hr) = Maximum Capacity (lbs/hr)\*((EF (lb/ton)/2000 (lbs.ton))  
 Potential to emit of PM/PM10/PM2.5 (tons/yr) = PTE (pounds/hr) \* 8760 (hr/yr) / 2000 pounds/ton

326 IAC 6-3-2(e) limited emissions:

$E = 4.10 P^{0.67}$  Where E = rate of emissions in lbs/hr and P = maximum process weight rate in tons/hr

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

**Company Name: Itsuwa USA, LLC  
Address City IN Zip: 1349 Arcadia Drive, Columbus, IN 47201  
Permit Number: R005-2771-00100  
Administrative Amendment No.: R005-33957-00100  
Reviewer: Renee Traivaranon  
Date: December 10, 2013**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.9	25.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	2.38E-02	9.52E-02	7.52E-03	1.25	6.89E-02	1.05

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

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs and greenhouse gas emissions calculations.

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

**Company Name:** Itsuwa USA, LLC  
**Address City IN Zip:** 1349 Arcadia Drive, Columbus, IN 47201  
**Permit Number:** R005-2771-00100  
**Administrative Amendment No.:** R005-33957-00100  
**Reviewer:** Renee Traivaranon  
**Date:** December 10, 2013

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.631E-05	1.503E-05	9.395E-04	2.255E-02	4.259E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.263E-06	1.378E-05	1.754E-05	4.760E-06	2.631E-05

Methodology is the same as page 4.

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

**Greenhouse Gas Calculations**

	Greenhouse Gas		
Emission Factor in lb/MM	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons	1,503	0.0	0.0
Summed Potential Emissions in tons/yr	1,503		
CO2e Total in tons/yr	1,512		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O

Potential Emission ton/yr x N2O GWP (310).



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

TO: Akira Hayashi  
Itsuwa USA, LLC  
1349 Arcadia Drive  
Columbus, IN 47201

DATE: December 19, 2013

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

SUBJECT: Final Decision  
Administrative Amendment  
005-33957-00100

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:  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	GHOTOPP 12/19/2013 Itsua USA LLC 005-33957-00100 Final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

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		Akira Hayashi Itsua USA LLC 1349 Arcadia Drive Columbus IN 47201 (Source CAATS) via confirmed delivery										
2		Columbus City Council and Mayors Office 123 Washington St Columbus IN 47201 (Local Official)										
3		Mr. Elbert Held 734 Hutchins Columbus IN 47201 (Affected Party)										
4		Mr. Lcnfc 1039 Sycamore St Columbus IN 47201 (Affected Party)										
5		Bartholomew County Commissioners 440 Third Street Columbus IN 47202 (Local Official)										
6		Mr. Jean Terpstra 3210 Grove Pkwy Columbus IN 47203 (Affected Party)										
7		Terry Lowe 1079 Spring Meadow Court Franklin IN 46131 (Affected Party)										
8		Mr. Charles Mitch 3210 Grove Parkway Columbus IN 47203 (Affected Party)										
9		Bartholomew County Health Department 440 3rd Street, Suite 303 Columbus IN 47201 (Health Department)										
10												
11												
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8			