



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: May 27, 2015

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

Source Name: Nachi America, Inc.

Permit Level: Minor Source Operating Permit (MSOP) Administrative Amendment

Permit Number: 081-35773-00018

Source Location: 715 Pushville Road
Greenwood, Indiana

Type of Action Taken: Changes that are administrative in nature

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 matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 35773.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

(continues on next page)

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.



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Michael R. Pence
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Joe Schmidt
Nachi America, Inc.
715 Pushville Road
Greenwood, IN 46143

May 27, 2015

Re: 081-35773-00018
Administrative Amendment to
M081-31793-00018

Dear Mr. Schmidt:

Nachi America, Inc. was issued a Minor Source Operating Permit (MSOP) Renewal No. M081-31793-00018 on September 20, 2012 for a stationary steel bearings production facility located at 715 Pushville Road, Greenwood, Indiana. On March 30, 2015, the Office of Air Quality (OAQ) received an application from the source requesting to install four (4) glove box blast booths and a natural gas combustion operation to the existing plant. The source is also requesting name, address and the scope of their activity descriptive language change to the existing plant.

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add the emissions units, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the applicant.

The following are the emissions units:

- (a) Four (4) glove box blast booths, identified as GB-01, GB-02, GB-03, and GB-04 respectively, approved in 2015 for construction, each with process weight rate 105.68 pounds of blasting agent per month, utilizing composite blasting agents for abrasive blasting on metal ball bearings. It is equipped with cartridge-style dust collector and designed to vent inside the building.
- (b) One (1) natural gas fired heating unit, identified as EU-01, using no control equipment, approved in 2015 for construction, with a maximum heat input capacity of 3.6 MMBtu per hour and venting outside the building.

See the attached Technical Support Document and Appendix A for the detailed changes.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire MSOP as amended.



A copy of the permit 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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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 of my staff at 317-233-5334 or 1-800-451-6027, and ask for extension 3-5334.

Sincerely,



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

Attachments: Updated Permit and Appendix A

TS/AN

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



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Nachi America, Inc.
715 Pushville Road
Greenwood, Indiana 46143**

(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.: M081-31793-00018	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 20, 2012 Expiration Date: September 20, 2022

Administrative Amendment No.: M081-34464-00018, issued on

Administrative Amendment No.: M081-35773-00018	
Issued by:  Tripurari P. Sinha, PhD., Section Chief Permits Branch Office of Air Quality	Issuance Date: May 27, 2015 Expiration Date: September 20, 2022

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a warehousing/ distribution, industrial & automotive bearing manufacturing, broach/ cutter/ rack/ drill Manufacturing Operation.

Source Address:	715 Pushville Road, Greenwood, Indiana 46143
General Source Phone Number:	317-535-5000
SIC Code:	3562 (Ball and Roller Bearing Manufacturing)
County Location:	Johnson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD 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) Two (2) enclosed wet cutting machines using a maximum of 60 gallons of coolant (identified as coolant 1) per year by the flow coating method to cut high alloy steel tubing to make different sizes of bearings.

Note: The product moves to a Turning Area that consists of twelve (12) turning machines. These machines do not involve any cutting or use of VOC containing material. There are no VOC or PM emissions from the turning machines.

- (b) One (1) natural gas fired heat treating furnace system with a heat input capacity of 2 MMBtu/hr.
- (c) One (1) natural gas fired heat tempering furnace system with a heat input capacity of 0.215 MMBtu/hr.
- (d) Five (5) enclosed primary wet grinding lines using a maximum of 660 gallons of coolant (identified as coolant 2) by the flow coating method per year to grind the outside of the bearings.
- (e) Six (6) enclosed conveyORIZED secondary wet grinding lines using a maximum of 4,950 gallons of honing oil per year and 1,740 gallons of coolant (identified as coolant 1) per year by the flow coating method, to grind the inside of the bearings.
- (f) Eight (8) conveyORIZED assembly lines using a maximum of 9,300 gallons of degreasing solvent per year to clean and degrease the bearings before they are assembled.

Note: Two (2) 50 horse power electric mist collectors are used to control and collect the mist from the manufacturing lines which vent internally to the building.

- (g) Twenty eight (28) natural gas fired roof top units with a combined maximum heat input

capacity of 10.01 MMBtu/hr.

- (h) One (1) natural gas fired heat treat furnace, identified as HT-3, constructed in 2014, with a maximum heat input capacity of 2.0 MMBtu per hour.
- (i) Four (4) glove box blast booths, identified as GB-01, GB-02, GB-03, and GB-04 respectively, approved in 2015 for construction, each with process weight rate 105.68 pounds of blasting agent per month, utilizing composite blasting agents for abrasive blasting on metal ball bearings. It is equipped with cartridge- style dust collector and designed to vent inside the building.
- (j) One (1) natural gas fired heating unit, identified as EU-01, using no control equipment, approved in 2015 for construction, with a maximum heat input capacity of 3.6 MMBtu per hour and venting outside the building.

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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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, M081-31793-00018, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 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.6 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.7 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.8 Property Rights or Exclusive Privilege

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

B.9 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.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90)

days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

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

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to A141-31967-00196 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.13 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.14 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.15 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.16 Source Modification Requirement

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

B.17 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.18 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.19 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.20 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. The analog instrument shall be capable of measuring

values outside of the normal range.

- (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.

where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the MSOP.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.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) 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) Two (2) enclosed wet cutting machines using a maximum of 60 gallons of coolant (identified as coolant 1) per year by the flow coating method to cut high alloy steel tubing to make different sizes of bearings.
- (b) One (1) natural gas fired heat treating furnace system with a heat input capacity of 2.0 MMBtu/hr.
- (c) One (1) natural gas fired heat tempering furnace system with a heat input capacity of 0.215 MMBtu/hr.
- (d) Five (5) enclosed primary wet grinding lines using a maximum of 660 gallons of coolant (identified as coolant 2) by the flow coating method per year to grind the outside of the bearings.
- (e) Six (6) enclosed conveyORIZED secondary wet grinding lines using a maximum of 4,950 gallons of honing oil per year and 1,740 gallons of coolant (identified as coolant 1) per year by the flow coating method, to grind the inside of the bearings.
- (f) Eight (8) conveyORIZED assembly lines using a maximum of 9,300 gallons of degreasing solvent per year to clean and degrease the bearings before they are assembled.

Note: Two (2) 50 horse power electric mist collectors are used to control and collect the mist from the manufacturing lines which vent internally to the building.

- (g) Twenty eight (28) natural gas fired roof top units with a combined maximum heat input capacity of 10.01 MMBtu/hr.

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

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

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

Pursuant to 326 IAC 8-3-4 (Conveyorized Degreaser Operations) for conveyorized degreaser 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 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the eight (8) conveyORIZED assembly lines with the degreasing operations that clean and degrease the bearings. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plans required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Nachi America, Inc.
Address:	715 Pushville Road
City:	Greenwood, Indiana 46143
Phone #:	317-535-5000
MSOP #:	M081-31793-00018

I hereby certify that Nachi America, Inc. is:

still in operation.

no longer in operation.

I hereby certify that Nachi America, Inc. is:

in compliance with the requirements of MSOP M081-31793-00018.

not in compliance with the requirements of MSOP M081-31793-00018.

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

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

Noncompliance:

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Technical Support Document (TSD) for an Administrative Amendment) to a
Minor Source Operating Permit (MSOP) (Renewal)

Source Description and Location
--

Source Name:	Nachi America Inc.
Source Location:	715 Pushville Road, Greenwood, Indiana 46143
County:	Johnson
SIC Code:	3562 (Ball and Roller Bearing Manufacturing)
Operation Permit No.:	M081-31793-00018
Operation Permit Issuance Date:	September 20, 2012
Administrative Amendment:	081-35773-00018
Permit Reviewer:	Anh Nguyen

On April 29, 2015, the Office of Air Quality (OAQ) received an application from Nachi Technology, Inc. related to the addition of four (4) glove box blast booths and one natural gas fired heating unit. The source also requested name, address and the scope of activity language description change to the existing plant.

Existing Approvals

The source was issued MSOP Renewal No. M081-31793-00018 on September 20, 2012. The source has since received the following approvals:

- (a) Administrative Amendment No. 081-34464-00018, issued on April 28, 2014.

County Attainment Status

The source is located in Johnson County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Attainment effective July 11, 2013, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

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

- (b) **PM_{2.5}**
Johnson County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Johnson County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, NO_x, PM₁₀, PM_{2.5}, and Pb pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source, prior to the proposed amendment:

This PTE table is from the TSD or Appendix A of No. M081-34464-00018, issued on April 28, 2014.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source Prior to an Amendment (tons/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Two (2) enclosed wet cutting machines and the six (6) secondary wet grinding lines - -Coolant 1 ² - usage	0.00	0.00	0.00	0.00	0.00	5.74	0.00	0.00	0.00
Five (5) enclosed primary wet grinding lines -- Coolant 2 usage	0.00	0.00	0.00	0.00	0.00	0.58	0.00	0.00	0.00
Six (6) enclosed secondary wet grinding lines -- Honing Oil usage	0.00	0.00	0.00	0.00	0.00	5.20	0.00	0.00	0.00
Eight (8) Assembly Line Degreasing Solvent usage	0.00	0.00	0.00	0.00	0.00	30.50	0.00	0.00	0.00
Natural Gas Combustion Units including the heat treat furnace system, 28 roof top units and heat tempering furnace	0.10	0.41	0.41	0.03	5.35	0.29	4.50	0.10	
Heat Treat Furnace	0.02	0.07	0.07	0.01	0.9	0.05	0.7	0.016	0.015
Total PTE of Entire Source	0.12	0.48	0.48	0.04	6.25	42.37	5.20	0.12	0.015
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM ₁₀), not particulate matter (PM), is considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . Notes: 1. None of the materials contains HAPs 2. Coolant 1 assumed to be 75% VOC based on MSDS.									

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs 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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) GHG
On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional

Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

Description of Proposed Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Nachi Technology, Inc. on March 30, 2015, relating to the addition of four (4) glove box blast booths and one natural gas fired heating unit to the existing plant. The source is also requesting name, address and the scope of their activity descriptive language change to the existing plant.

The following is a list of the new emission units and pollution control devices:

- (a) Four (4) glove box blast booths, identified as GB-01, GB-02, GB-03, and GB-04 respectively, approved in 2015 for construction, each with process weight rate 105.68 pounds of blasting agent per month, utilizing composite blasting agents for abrasive blasting on metal ball bearings. It is equipped with cartridge- style dust collector and designed to vent inside the building.
- (b) One (1) natural gas fired heating unit, identified as EU-01, using no control equipment, approved in 2015 for construction, with a maximum heat input capacity of 3.6 MMBtu per hour and venting outside the building.

Enforcement Issues

There are no pending enforcement actions related to this amendment.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Amendment

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed amendment. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Amendment (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
4 Blast booths	0.025	0.017	0.017	0.00	0.00	0.00	0.00	0.00	0.00
NG combustion	0.030	0.120	0.12	0.01	1.58	0.087	1.33	0.028	0.030 Hexane
Total PTE of Proposed Modification	0.055	0.137	0.137	0.009	1.58	0.087	1.33	0.028	0.030 Hexane
negl. = negligible									

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add emissions units, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the applicant.

PTE of the Entire Source After Issuance of the MSOP Amendment

The table below summarizes the uncontrolled/unlimited 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 Administrative Amendment (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Two (2) enclosed wet cutting machines and the six (6) secondary wet grinding lines -- Coolant 1 ² - usage	0.00	0.00	0.00	0.00	0.00	5.74	0.00	0.00	0.00
Five (5) enclosed primary wet grinding lines -- Coolant 2 usage	0.00	0.00	0.00	0.00	0.00	0.58	0.00	0.00	0.00
Six (6) enclosed secondary wet grinding lines -- Honing Oil usage	0.00	0.00	0.00	0.00	0.00	5.20	0.00	0.00	0.00
Eight (8) Assembly Line Degreasing Solvent usage	0.00	0.00	0.00	0.00	0.00	30.50	0.00	0.00	0.00
Natural Gas Combustion Units including the heat treat furnace system, 28 roof top units and heat tempering furnace	0.102	0.407	0.407	0.032	5.35	0.29	4.50	0.101	0.096 Hexane
Heat Treat Furnance Furnace	0.016	0.065	0.065	0.005	0.86	0.05	0.72	0.016	0.015
4 Blast booths	0.025	0.017	0.017	0.00	0.00	0.00	0.00	0.00	0.00
NG combustion	0.030	0.120	0.120	0.01	1.58	0.09	1.33	0.03	0.028 Hexane
Total PTE of Entire Source	0.12 0.173	0.48 0.610	0.48 0.610	0.04 0.047	6.25 7.79	42.37 42.46	5.20 6.55	0.12 0.147	0.015 0.096
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.
 Notes: 1. None of the materials contains HAPs
 2. Coolant 1 assumed to be 75% VOC based on MSDS.

The table below summarizes the controlled/limited potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted, and includes additional limits, such as PSD or 326 IAC 8-1-6 avoidance limits.)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP Administrative Amendment (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Two (2) enclosed wet cutting machines and the six (6) secondary wet grinding lines -- Coolant 1 ² - usage	0.00	0.00	0.00	0.00	0.00	5.74	0.00	0.00	0.00
Five (5) enclosed primary wet grinding lines -- Coolant 2 usage	0.00	0.00	0.00	0.00	0.00	0.58	0.00	0.00	0.00
Six (6) enclosed secondary wet grinding lines -- Honing Oil usage	0.00	0.00	0.00	0.00	0.00	5.20	0.00	0.00	0.00
Eight (8) Assembly Line Degreasing Solvent usage	0.00	0.00	0.00	0.00	0.00	30.50	0.00	0.00	0.00
Natural Gas Combustion Units including the heat treat furnace system, 28 roof top units and heat tempering furnace	0.102	0.407	0.407	0.032	5.35	0.29	4.50	0.101	0.96 Hexane
Heat Treat Furnace	0.016	0.065	0.065	0.005	0.86	0.05	0.72	0.016	0.015
4 Blast booths	0.025	0.017	0.017	0.00	0.00	0.00	0.00	0.00	0.00
NG combustion	0.030	0.120	0.120	0.01	1.58	0.09	1.33	0.03	0.028 Hexane
Total PTE of Entire Source	0.173	0.610	0.610	0.047	7.79	42.46	6.55	0.147	0.096
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". Notes: 1. None of the materials contains HAPs 2. Coolant 1 assumed to be 75% VOC based on MSDS									

(a) MSOP Status

(1) Criteria Pollutants

This amendment to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

(2) HAPs

This amendment 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 HAPs 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 provisions of 326 IAC 2-7.

- (b) **PSD Minor Source – PM**
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit PM 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.
- (c) **PSD Minor Source – Other Regulated Pollutants**
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit of all PSD 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 Amendment Section above or Appendix A.

Federal Rule Applicability Determination

- (a) **New Source Performance Standards (NSPS) [326 IAC 12 and 40 CFR Part 60]**
There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed amendment.
- (b) **National Emission Standards for Hazardous Air Pollutants (NESHAP) [326 IAC 14, 326 IAC 20 and 40 CFR Part 63]**
There are no new National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed amendment).
- (c) **Compliance Assurance Monitoring (CAM)**
Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

- (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))**
See PTE of the Entire Source After Issuance of the MSOP Amendment Section above.
- (c) **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**
Each of the blast units and the natural gas-fired heater are not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units are 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.

See PTE of the Entire Source After Issuance of the MSOP Amendment Section above.
- (d) **326 IAC 6-4 (Fugitive Dust Emissions Limitations)**
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

(e) **326 IAC 7-1.1(Sulfur Dioxide Rules)**

The proposed amendment is not subject to the requirements of 326 IAC 7-1.1-1, since the unlimited potential to emit of Sulfur Dioxide from the new natural gas-fired combustion unit is less than 25 tons per year or 10 pounds per hour.

Glove Box Blasting Operation

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

The four (4) glove box blast booths, each is not subject to the requirements of 326 IAC 6-3-2 because the potential particulate emissions from each glove box blast booth are less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) the glove box blast booths is exempt from 326 IAC 6-3, and the requirements are not included in the permit.

(g) **326 IAC 6.5 (Particulate Matter Limitations)**

The source is not subject to 326 IAC 6.5 because they are located in Johnson County.

(h) **326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

(1) The unlimited VOC potential emissions from the four globe box blast booths, identified as GB-01, GB-02, GB-03, and GB-04, each, are less than twenty-five (25) tons per year. Therefore, the proposed amendment is not subject to the requirements of 326 IAC 8-1-6.

Natural gas-fired Combustion

(i) **326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)**

The natural gas fired heating unit, identified as EU-01 is not subject to the requirements of 326-IAC 6-2, since this unit is not a source of indirect heating.

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

Pursuant to 326 IAC 1-2-59, the requirements of 326 IAC 6-3-2 is not applicable to the natural gas fired heating unit, identified as EU-01, since liquid and gaseous fuels and combustion air are not considered as part of the process weight.

(j) **326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

(1) The natural gas-fired heater is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the natural gas fired heating unit, identified as EU-01 is less than twenty-five (25) tons per year.

(k) There are no other 326 IAC 8 rules that are applicable to the (facility/unit).

Compliance Determination, Monitoring and Testing Requirements
--

(a) There are no compliance determination and compliance monitoring to this proposed amendment during this review

The existing compliance requirements will not change as a result of this amendment. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP (Renewal) No: M081-31793-00018, issued on September 20, 2012 with its most recent revisions and amendments.

Proposed Changes

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

Change 1: The source name, mailing address, and scope of activity has been changed pursuant to Pursuant to 326 IAC 2-6.1-6(d)(2)(A).

**Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY**

~~Nachi Technology, Inc.~~ **Nachi America Inc.**
713 715 Pushville Road
Greenwood, Indiana 46143

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 steel bearings production facility~~ **Warehousing/
Distribution, Industrial & Automotive Bearing Manufacturing , Broach/ Cutter/ Rack/ Drill
Manufacturing Operation.**

Source Address: 713 715 Pushville Road, Greenwood, Indiana 46143
General Source Phone Number: 317-535-5000
SIC Code: 3562 (Ball and Roller Bearing Manufacturing)
County Location: Johnson
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit Program
Minor Source, under PSD Rules
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

**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:	Nachi Technology America, Inc.
Address:	713 715 Pushville Road
City:	Greenwood, Indiana 46143
Phone #:	317-535-5000
MSOP #:	M081-31793-00018

- I hereby certify that Nachi ~~Technology~~ **America**, Inc. is: still in operation.
 no longer in operation.
- I hereby certify that Nachi ~~Technology~~ **America**, Inc. is: in compliance with the requirements of MSOP M081-31793-00018.
 not in compliance with the requirements of MSOP M081-31793-00018.

Change 2: New units install and their applicable requirements.

A.2 Emission Units and Pollution Control Equipment Summary

-
- (i) **Four (4) glove box blast booths, identified as GB-01, GB-02, GB-03, and GB-04 respectively, approved in 2015 for construction, each with process weight rate of 105.68 pounds of blasting agent per month, utilizing composite blasting agents for abrasive blasting on metal ball bearings. It is equipped with cartridge- style dust collector and designed to vent inside the building.**
 - (j) **One (1) natural gas fired heating unit, identified as EU-01, using no control equipment, approved in 2015 for construction, with a maximum heat input capacity of 3.6 MMBtu per hour and venting outside the building.**
-

Additional Changes

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

Change 1: IDEM is changing the Section B and C to reflect its standard permit model for all sources.

SECTION B GENERAL CONDITIONS

.....

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) **The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.**

- (b) **If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.**
- (c) **The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.**

B. 2 4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

.....

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

.....

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.7 8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

.....

C.14 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. **The analog instrument shall be capable of measuring values outside of the normal range.**

.....

C. 15 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.

where applicable:

- (AA) **All calibration and maintenance records.**
- (BB) **All original strip chart recordings for continuous monitoring instrumentation.**
- (CC) **Copies of all reports required by the MSOP.**

Records of required monitoring information include the following, where applicable:

- (AA) **The date, place, as defined in this permit, and time of sampling or measurements.**
- (BB) **The dates analyses were performed.**
- (CC) **The company or entity that performed the analyses.**
- (DD) **The analytical techniques or methods used.**
- (EE) **The results of such analyses.**

(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

.....

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 30, 2015. Additional information was received April 28, 2015.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Anh Nguyen at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-5334 or toll free at 1-800-451-6027 extension 3-5334.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: Nachi Technology, Inc.
Address: 713 Pushville Road, Greenwood, Indiana 46143
Permit Number: 081-35773-00018
Plt ID: 081-00018
Reviewer: Anh Nguyen
Date: 4/29/15

Uncontrolled Potential emissions (tons/year)										
New Emission Units	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Single Hap	Worst Single Hap
4 Blast Booths	0.025	0.017	0.017	0.000	0.00	0.000	0.00	0.000	0.000	NA
NG	0.030	0.120	0.120	0.009	1.580	0.087	1.327	0.030	0.028	Hexane
Total New emissions	0.055	0.137	0.137	0.009	1.58	0.087	1.33	0.030	0.028	Hexane

Uncontrolled Potential emissions (tons/year)										
Units	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Single Hap	Worst Single Hap
Two (2) enclosed wet cutting machines and the six (6) secondary wet grinding lines Coolant 1 ² - usage	0.00	0.00	0.00	0.00	0.00	5.74	0.00	0.00	0.00	NA
Five (5) enclosed primary wet grinding lines Coolant 2 usage	0.00	0.00	0.00	0.00	0.00	0.58	0.00	0.00	0.00	NA
Six (6) enclosed secondary wet grinding lines Honing Oil usage	0.00	0.00	0.00	0.00	0.00	5.20	0.00	0.00	0.00	NA
Eight (8) Assembly Line Degreasing Solvent usage	0.00	0.00	0.00	0.00	0.00	30.50	0.00	0.00	0.00	NA
Natural Gas Combustion Units including the heat treat furnace system, 28 roof top units and heat tempering furnace	0.102	0.407	0.407	0.032	5.35	0.29	4.50	0.101	0.096	Hexane
Heat Treat Furnance	0.016	0.065	0.065	0.005	0.86	0.05	0.72	0.016	0.02	Hexane
4 Blast Booths	0.025	0.017	0.017	0.000	0.00	0.000	0.00	0.000	0.000	NA
NG	0.030	0.120	0.120	0.009	1.58	0.087	1.33	0.030	0.028	Hexane
Total Source	0.173	0.610	0.610	0.047	7.79	42.46	6.55	0.147	0.096	Hexane

Notes: ¹ None of the materials contains HAPs.

² Coolant 1 assumed to be 75% VOC based on MSDS.

PM=PM10=PM2.5

**Appendix A: Emission Calculations
Abrasive Blasting**

Company Name: Nachi Technology, Inc.
Address: 713 Pushville Road, Greenwood, Indiana 46143
Permit Number: 081-35773-00018
Plt ID: 081-00018
Reviewer: Anh Nguyen
Date: 4/29/15

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor (EF)		
	lb PM / lb abrasive	lb PM10 / lb PM	lb PM2.5 / lb PM
Grit	0.010	0.70	0.7
Other	0.010		

Potential to Emit Before Control			
FR = Flow rate of actual abrasive (lb/hr) =	0.1420	lb/hr (per booth)	
w = fraction of time of wet blasting =	0	%	
N = number of nozzles =	4		
EF = PM emission factor for actual abrasive from Table 1 =	0.010	lb PM/ lb abrasive	
PM10 emission factor ratio for actual abrasive from Table 1 =	0.70	lb PM10 / lb PM	
	PM	PM10/PM2.5	
Potential to Emit (before control) =	0.006	0.004	lb/hr
=	0.136	0.095	lb/day
=	0.025	0.017	ton/yr

Potential to Emit After Control			
	PM	PM10/PM2.5	
Emission Control Device Efficiency =	99.0%	99.0%	
Potential to Emit (after control) =	0.00006	0.00004	lb/hr
=	0.00136	0.00095	lb/day
=	0.00025	0.00017	ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
 Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))
 Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]
 Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
 Note:

The unit consumed collectively for 4 booths is 100lb/month (for a 176 hours of operation per month (22 work days times 8 hours per day)). If the blast booth is working at 8760 hr then the pounds per month for each booth is as follow:

100 lb of abrasive consumption for all 4 blast booths. * (744 hr/moth)/176 hr/month =	422.73 lb/month	note:	31 days/mo * 24 hr/day =	744 hrs/month
for each blast booths	105.68 lb/month			
	0.142 lb/hr of abrasive for each booth			

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

Company Name: Nachi Technology, Inc.
Address City IN Zip: 713 Pushville Road, Greenwood, Indiana 46143
Permit Number: 081-35773-00018
Plt ID: 081-00018
Reviewer: Anh Nguyen
Date: 4/29/15

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.6

31.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.03	0.12	0.12	0.01	1.58	0.09	1.33

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

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

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.32E-05	1.90E-05	1.18E-03	2.84E-02	5.37E-05	0.030

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	7.90E-06	1.74E-05	2.21E-05	6.00E-06	3.32E-05	0.000
	Total HAPs					0.030
	Worst HAP					0.028

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, etc.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

**Company Name: Nachi Technology, Inc.
Address City IN Zip: 713 Pushville Road, Greenwood, Indiana 46143
Permit Number: 081-35773-00018 .
Plt ID: 081-00018
Reviewer: Anh Nguyen
Date: 4/29/15**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
2.0	1020	17.2

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.02	0.07	0.07	0.01	0.9	0.05	0.7

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Potential Emission in tons/yr	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	1.616E-02

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Potential Emission in tons/yr	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	4.706E-05
	Total HAPs					1.621E-02
	Worst HAP					1.546E-02

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculation:
VOC and Particulate
Honing Oil and Solvent**

Company Name: Nachi Technology, Inc.
Address City IN Zip: 713 Pushville Road, Greenwood, Indiana 46143
Permit Number: 081-35773-00018
Pit ID: 081-00018
Reviewer: Anh Nguyen
Date: 4/29/15

Material ¹	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gallons per year	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Honing Oil	7.01	30.00%	0.0%	30.0%	0.0%	70.00%	4950.00	2.10	2.10	1.19	28.52	5.20	0.00	3.00	100%
Degreasing Solvent	6.56	100.00%	0.0%	100.0%	0.0%	0.00%	9300.00	6.56	6.56	6.96	167.15	30.50	0.00	N/A	100%
Coolant 1 ²	8.51	75.00%	0.0%	75.0%	0.0%	0.00%	1800.00	6.38	6.38	1.31	31.48	5.74	0.00	N/A	100%
Coolant 2	8.74	20.00%	0.0%	20.0%	0.0%	0.00%	660.00	1.75	1.75	0.13	3.16	0.58	0.00	N/A	100%

Potential Emissions

8.15 230.30 42.03 0.00

Notes: ¹ None of the materials contains HAPs.
² Coolant 1 assumed to be 75% VOC based on MSDS.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/year)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/year)
 Potential VOC Tons per Year = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/year) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (gal/year) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

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

Company Name: Nachi Technology, Inc.
Address City IN Zip: 713 Pushville Road, Greenwood, Indiana 46143
Permit Number: 081-35773-00018
Reviewer: Anh Nguyen
Date: 4/29/15

Emission Unit	Heat Input Capacity (MMBtu/hr)
Heat treat furnace system	2.00
28 roof-top units	10.01
Heat tempering furnace	0.215
Total	12.225

Heat Input Capacity	HHV	Potential Throughput
MMBtu/hr	mmBtu mmscf	MMCF/yr
12.225	1000	107.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.10	0.41	0.41	0.03	5.35	0.29	4.50

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

Methodology

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

See next page for HAPs emissions calculations.

updated 7/11

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

Company Name: Nachi Technology, Inc.
Address City IN Zip: 713 Pushville Road, Greenwood, Indiana 46143
Permit Number: 081-35773-00018
Plt ID: 081-00018
Reviewer: Anh Nguyen
Date: 4/29/15

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	1.124E-04	6.425E-05	4.016E-03	9.638E-02	1.821E-04
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	2.677E-05	5.890E-05	7.496E-05	2.035E-05	1.124E-04
Total					0.101

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See next page for Greenhouse Gas calculations.

updated 7/11



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: Joe Schmidt
Nachi America, Inc.
715 Pushville Road
Greenwood, IN 46143

DATE: May 27, 2015

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

SUBJECT: Final Decision
Minor Source Operating Permit (MSOP) Administrative Amendment
081-35773-00018

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:
Mack Overton, Keramida Environmental, Inc.
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 5/27/2015 Nachi American Incorporated 081-35773-00018 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		Joe Schmidt Nachi American Incorporated 715 Pushville Road Greenwood IN 46143 (Source CAATS) VIA CERTIFIED MAIL USPS										
2		Johnson County Commissioners 5 East Jefferson Franklin IN 46131 (Local Official)										
3		Johnson County Health Department 86 W. Court St, Courthouse Annex Franklin IN 46131-2345 (Health Department)										
4		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
5		Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party)										
6		Mr. Mack Overton Keramida Environmental, Inc. 401 North College Avenue Indianapolis IN 46202 (Consultant)										
7		Greenwood City Council and Mayors Office 300 South Madison Avenue Greenwood IN 46142-3149 (Local Official)										
8												
9												
10												
11												
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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.
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