



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: June 30, 2015

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

Source Name: Ryobi Die Casting U.S.A., Inc.

Permit Level: FESOP- Administrative Amendment

Permit Number: 145-35824-00031

Source Location: 800 West Mausoleum Road
Shelbyville, Indiana 46176

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 35824.

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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Mr. Brian Smith
Ryobi Die Casting U.S.A., Inc.
800 W. Mausoleum Rd.
Shelbyville, IN 46176

June 30, 2015

Re: 145-35824-00031
Administrative Amendment to
F145-30081-00031

Dear Mr. Smith:

Ryobi Die Casting, U.S.A., Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F145-30081-00031 on August 23, 2011 for a stationary aluminum die-casting plant located at 800 W. Mausoleum Rd., Shelbyville, IN 46176. On May 13, 2015, the Office of Air Quality (OAQ) received an application from the source requesting to modify five (5) air make-up units, add one (1) air make-up unit, and remove non-applicable requirements from the permit.

Pursuant to 326 IAC 2-8-10, the permit is hereby administratively amended as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as amended. The permit references the below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this amendment:

Attachment A: 40 CFR 60, Subpart JJJJ (NSPS)
Attachment B: 40 CFR 63, Subpart ZZZZ (NESHAP)

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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 Charles Sullivan of my staff at 317-232-8422 or 1-800-451-6027, and ask for extension 2-8422.

Sincerely,

 for JK

Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and Technical Support Document

JK/cs

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



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Governor

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Commissioner

**Federally Enforceable State Operating Permit
Renewal
OFFICE OF AIR QUALITY**

**Ryobi Die Casting U.S.A., Inc.
800 West Mausoleum Road
Shelbyville, Indiana 46176**

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

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

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

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

Operation Permit No.: F145-30081-00031	
Issued by: <i>Original signed by:</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 23, 2011. Expiration Date: August 23, 2021

Significant Permit Revision No.: 145-31356-00031, issued on June 28, 2012
Administrative Amendment No.: 145-33567-00031, issued on September 13, 2013
Administrative Amendment No.: 145-33814-00031, issued on November 25, 2013
Administrative Amendment No.: 145-34530-00031, issued on July 28, 2014

Administrative Amendment No.: 145-35824-00031	
Issued by: <i>Noted for JK</i> Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 30, 2015 Expiration Date: August 23, 2021

TABLE OF CONTENTS

A. SOURCE SUMMARY	5
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
B. GENERAL CONDITIONS	10
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.16 Permit Renewal [326 IAC 2-8-3(h)]	
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19 Source Modification Requirement [326 IAC 2-8-11.1]	
B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]	
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	20
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

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

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 27

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

- D.1.1 PM, PM2.5 and PM10 Emissions [326 IAC 2-2] [326 IAC 2-8-4]
- D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.4 Particulate Control

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

- D.1.5 Visible Emissions Notations
- D.1.6 Parametric Monitoring
- D.1.7 Scrubber Detection

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.8 Record Keeping Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 31

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

- D.2.1 PM, PM2.5 and PM10 Limits [326 IAC 2-2] [326 IAC 2-8-4]
- D.2.2 Particulate Emissions [326 IAC 6-3-2]
- D.2.3 Material Usage [40 CFR 63, Subpart RRR]
- D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.2.5 Testing Requirements

Compliance Monitoring Requirements

- D.2.6 Visible Emissions Notations

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.2.7 Record Keeping Requirements
- D.2.8 Reporting Requirements

D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 34

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

D.3.1 FESOP Limits [326 IAC 2-2] [326 IAC 2-8-4]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.2 Record Keeping Requirements

D.3.3 Reporting Requirements

SECTION D.4 FACILITY OPERATION CONDITIONS..... 38

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

SECTION D.5 FACILITY OPERATION CONDITIONS..... 40

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

D.5.1 Particulate [326 IAC 6-3-2]

SECTION E.1 FACILITY OPERATION CONDITIONS

E.1.1 New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines [40 CFR 60, Subpart JJJJ]

SECTION E.2 FACILITY OPERATION CONDITIONS

E.2.1 National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines,[40 CFR 63, Subpart ZZZZ]

Certification Form 43
Emergency Occurrence Form 44
Quarterly Report Form 47
Quarterly Deviation and Compliance Monitoring Report Form 48

Attachment A - 40 CFR 60, Subpart JJJJ (NSPS)
Attachment B - 40 CFR 63, Subpart ZZZZ (NESHAP)

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary aluminum die-casting plant and uses clean aluminum ingots and is not primarily engaged in the metal recovery process.

Source Address:	800 West Mausoleum Road, Shelbyville, Indiana 46176
General Source Phone Number:	317-392-8398
SIC Code:	3363 (Aluminum Die Castings)
County Location:	Shelby
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

This aluminum die casting company consists of four (4) plants which represent four physical buildings. Since these four (4) plants are located on the same property and under common control of the same entity, they will be considered one (1) source in this FESOP.

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

- (a) Ten (10) shotblasting lines, constructed after 1986, consisting of the following:
 - (1) One (1) shotblasting line, identified as SBS-6, with maximum process rate of 3,239 pounds of parts per hour, controlled by scrubber WDC-4, and exhausting through stack SV# WDC-4.
 - (2) One (1) shotblasting line, identified as SBS-7, with maximum process rate of 1900 pounds of parts per hour, controlled by scrubber WDC-5, and exhausting through stack SV# WDC-5.
 - (3) Two (2) shotblasting lines, identified as SBS-9 and SBS-10, with maximum process rates of 1,640 and 4,000 pounds of parts per hour respectively, controlled by scrubber WDC-2, and exhausting through stack SV# WDC-2.
 - (4) Two (2) shotblasting lines, identified as 03-SBS-01 and 03-SBS-04, with maximum process rates of 5,670 and 2,403 pounds of parts per hour respectively, both controlled by scrubber 03-WDC-01, and exhausting through stack SV# 03-WDC-01.
 - (5) Two (2) shotblasting lines, identified as 03-SBS-02 and 03-SBS-03, with maximum process rates of 1,280 and 1,920 pounds of parts per hour respectively, both controlled by scrubber 03-WDC-02, and exhausting through stack SV# 03-WDC-02.

- (6) One (1) shotblasting line, identified as 03-SBS-06, with a maximum process rate of 3,008 pounds of parts per hour, controlled by scrubber 03-WDC-03, and exhausting through stack SV# 03-WDC-03.
- (7) One (1) shotblasting line, identified as SBS-11 with maximum process rate of 1,640 pounds of parts per hour, controlled by scrubber WDC-5, and exhausting through stack SV# WDC-5.
- (b) Eight (8) natural gas-fired aluminum melting furnaces, consisting of the following:
 - (1) One (1) aluminum melting furnace, identified as MF-5, constructed in 1989, and approved for modification in 2012, with a maximum throughput rate of 10,000 pounds of aluminum ingots and internally generated aluminum scrap per hour, and with a maximum flux usage of 10.0 pounds per hour, with a maximum heat input capacity of 14.4 MMBtu/hr, and exhausting through stack SV# MF-5.
 - (2) One (1) aluminum melting furnace, identified as MF-6, constructed in 1994, and approved for modification in 2012, with a maximum throughput rate of 15,000 pounds of aluminum ingots and internally generated aluminum scrap per hour, and with a maximum flux usage of 15.0 pounds per hour, with a maximum heat capacity of 19.3 MMBtu/hr, and exhausting through stack SV# MF-6.
 - (3) One (1) aluminum melting furnace, identified as MF-1S, constructed in 1998, and approved for modification in 2012, with a maximum throughput rate of 9,000 pounds of aluminum ingots and internally generated aluminum scrap per hour, and with a maximum flux usage of 9.0 pounds per hour, with a maximum heat input capacity of 15.0 MMBtu/hr, and exhausting through stack SV# MF-1S.
 - (4) One (1) aluminum melting furnace, identified as MF-2M, constructed in 1998, and approved for modification in 2012, with a maximum throughput rate of 9,000 pounds of aluminum ingots and internally generated aluminum scrap per hour, and with a maximum flux usage of 9.0 pounds per hour, with a maximum heat input capacity of 23.8 MMBtu/hr, and exhausting through stack SV# MF-2M.
 - (5) One (1) aluminum melting furnace, identified as MF-3N, constructed in 2000, and approved for modification in 2012, with a maximum throughput rate of 7,000 pounds of aluminum ingots and internally generated aluminum scrap per hour, and with a maximum flux usage of 7.0 pounds per hour, with a maximum heat capacity of 13.4 MMBtu/hr, and exhausting through stack SV# MF-3N.
 - (6) One (1) aluminum melting furnace, identified as MF-1, constructed in 2005, and approved for modification in 2012, with a maximum throughput rate of 15,000 pounds of aluminum ingots and internally generated aluminum scrap per hour, and with a maximum flux usage of 15.0 pounds per hour, with a maximum heat input capacity of 18 MMBtu/hr, and exhausting through stack SV# MF-1.
 - (7) One (1) aluminum melting furnace, identified as MF-7, constructed in 2012, with a maximum heat input capacity of 13.4 MMBtu/hr, with a maximum throughput rate of 6,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 6.0 pounds per hour, and exhausting through stack SV#MF-7.
 - (8) One (1) aluminum melting furnace, identified as MF-8A, approved in 2014 for construction, with a maximum heat input capacity of 1.5 MMBtu/hr, with a maximum throughput rate of 1,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 2.5 pounds per hour, and exhausting through stack SV#MF-8.

- (c) One (1) aluminum scrap handling process, with a maximum throughput rate of 12,500 pounds of trimmed aluminum parts per hour. This process has negligible emissions.
- (d) One (1) aluminum die casting process, constructed in 1986, with a maximum throughput rate of 27.5 tons of parts per hour. This closed process has no particulate emissions.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour each:
 - (1) One hundred and six (106) natural gas-fired combustion units in Plant 1, with a total heat capacity of 109.77 MMBtu/hr, including the following
 - (A) Three (3) pre-heat stations, each with a maximum heat input of 0.008 MMBtu/hr.
 - (B) One (1) make-up air unit, with a maximum heat input of 1.02 MMBtu/hr.
 - (C) Three (3) make-up air units, each with a maximum heat input of 1.972 MMBtu/hr.
 - (D) One (1) make-up air unit, with a maximum heat input of 2.066 MMBtu/hr.
 - (E) Four (4) make-up air units, each with a maximum heat input of 2.137 MMBtu/hr.
 - (F) Eleven (11) make-up air units, each with a maximum heat input of 2.1875 MMBtu/hr.
 - (G) Two (2) make-up air units, each with a maximum heat input of 2.324 MMBtu/hr.
 - (H) One (1) make-up air unit, with a maximum heat input of 2.5 MMBtu/hr.
 - (I) Two (2) make-up air units, each with a maximum heat input of 3.052 MMBtu/hr.
 - (J) Six (6) make-up air units, each with a maximum heat input of 3.327 MMBtu/hr.
 - (K) One (1) make-up air unit, with a maximum heat input of 4.1 MMBtu/hr.
 - (L) One (1) make-up air unit, with a maximum heat input of 5 MMBtu/hr.
 - (M) Fifty-one (51) space unit heaters, each with a maximum heat input of 0.1 MMBtu/hr.
 - (N) Ten (10) door heaters, each with a maximum heat input of 0.4 MMBtu/hr.
 - (O) One (1) office heater, with a maximum heat input of 0.215 MMBtu/hr.
 - (P) One (1) office heater, with a maximum heat input of 0.16 MMBtu/hr.
 - (Q) One (1) make-up air unit, with a maximum heat input of 0.009 MMBtu/hr.

- (R) Three (3) make-up air units, each with a maximum heat input of 2.629 MMBtu/hr.
- (S) Three (3) make-up air units, each with a maximum heat input of 2.817 MMBtu/hr.
- (2) Fourteen (14) natural gas-fired combustion units in Plant 2, with a total heat capacity of 11.12 MMBtu/hr, including the following:
 - (A) One (1) make-up air unit, with a maximum heat input of 0.75 MMBtu/hr.
 - (B) One (1) air curtain, with a maximum heat input of 3.5 MMBtu/hr.
 - (C) One (1) air curtain, with a maximum heat input of 3.0 MMBtu/hr.
 - (D) One (1) air curtain, with a maximum heat input of 2.203 MMBtu/hr.
 - (E) Nine (9) space unit heaters, each with a maximum heat input of 0.2 MMBtu/hr.
 - (F) One (1) office heater, with a maximum heater input of 0.0514 MMBtu/hr.
- (3) Eighty-eight (88) natural gas-fired combustion units in Plant 3 (with no back-up fuel), with a total heat capacity of 117.12 MMBtu/hr, including the following:
 - (A) Two (2) pre-heat stations, each with a maximum heat input of 2.0 MMBtu/hr.
 - (B) Six (6) door heaters, each with a maximum heat input of 0.4 MMBtu/hr.
 - (C) Eight (8) door heaters, each with a maximum heat input of 0.814 MMBtu/hr.
 - (D) One (1) make-up air unit, with a maximum heat input of 0.751 MMBtu/hr.
 - (E) Two (2) make-up air units, each with a maximum heat input of 1.503 MMBtu/hr.
 - (F) Six (6) make-up air units, each with a maximum heat input of 1.784 MMBtu/hr.
 - (G) One (1) make-up air unit, with a maximum heat input of 1.972 MMBtu/hr.
 - (H) Three (3) make-up air units, each with a maximum heat input of 2.536 MMBtu/hr.
 - (I) Four (4) make-up air units, each with a maximum heat input of 3.287 MMBtu/hr.
 - (J) Sixteen (16) make-up air units, each with a maximum heat input of 3.945 MMBtu/hr.
 - (K) Thirty-nine (39) space unit heaters, each with a maximum heat input of 0.1 MMBtu/hr.
- (4) Seven (7) natural gas-fired combustion units in Plant 4, with a total heat capacity of 1.5 MMBtu/hr, including the following:

- (A) Five (5) unit heaters, each with a maximum heat input of 0.216 MMBtu/hr.
- (B) One (1) door heater, with a maximum heat input of 0.39 MMBtu/hr.
- (C) One (1) AC/heater, with a maximum heat input of 0.031 MMBtu/hr.
- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (d) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (e) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (f) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (g) Cleaners and solvents that contain less than one percent (1%) of VOC by weight.
- (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (i) Quenching operations used with heat treating processes.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Paved roads and parking lots with public access.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) Stationary fire pumps.
- (n) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (o) One (1) natural gas-fired emergency generator, considered a spark ignition internal combustion engine, manufactured after 2006, constructed in 2010, with a maximum heat input capacity of 0.29 MMBtu/hr, using no controls, and exhausting inside the building.

Under 40 CFR 60, Subpart JJJJ, this is considered an affected source.

Under 40 CFR 63, Subpart ZZZZ, this is considered an affected source.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F145-30081-00031, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to F145-30081-00031 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:

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

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

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

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

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

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [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 2-8-4(1)]

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

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

- (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 [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

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

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information, which may include the following, 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 FESOP.

Records of required monitoring information, which may 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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) Ten (10) shotblasting lines, constructed after 1986, consisting of the following:
- (1) One (1) shotblasting line, identified as SBS-6, with maximum process rate of 3,239 pounds of parts per hour, controlled by scrubber WDC-4, and exhausting through stack SV# WDC-4.
 - (2) One (1) shotblasting line, identified as SBS-7, with maximum process rate of 1900 pounds of parts per hour, controlled by scrubber WDC-5, and exhausting through stack SV# WDC-5.
 - (3) Two (2) shotblasting lines, identified as SBS-9 and SBS-10, with maximum process rates of 1,640 and 4,000 pounds of parts per hour respectively, controlled by scrubber WDC-2, and exhausting through stack SV# WDC-2.
 - (4) Two (2) shotblasting lines, identified as 03-SBS-01 and 03-SBS-04, with maximum process rates of 5,670 and 2,403 pounds of parts per hour respectively, both controlled by scrubber 03-WDC-01, and exhausting through stack SV# 03-WDC-01.
 - (5) Two (2) shotblasting lines, identified as 03-SBS-02 and 03-SBS-03, with maximum process rates of 1,280 and 1,920 pounds of parts per hour respectively, both controlled by scrubber 03-WDC-02, and exhausting through stack SV# 03-WDC-02.
 - (6) One (1) shotblasting line, identified as 03-SBS-06, with a maximum process rate of 3,008 pounds of parts per hour, controlled by scrubber 03-WDC-03, and exhausting through stack SV# 03-WDC-03.
 - (7) One (1) shotblasting line, identified as SBS-11, with a maximum process rate of 1,640 pounds of parts per hour, controlled by scrubber WDC-5, and exhausting through stack SV# WDC-5.

(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 2-8-4(1)]

D.1.1 PM, PM10 and PM2.5 Emissions [326 IAC 2-2] [326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 2-8, the PM10 and PM2.5 emissions from the shotblasting lines shall not exceed the emission limits listed in the table below:

Unit ID	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
SBS-6	0.27	0.27
SBS-7	0.16	0.16
SBS-9	0.14	0.14
SBS-10	0.34	0.34
SBS-11	0.14	0.14
03-SBS-01	0.48	0.48
03-SBS-02	0.11	0.11
03-SBS-03	0.16	0.16
03-SBS-04	0.20	0.20
03-SBS-06	0.26	0.26

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

- (b) In order to render 326 IAC 2-2 not applicable, the PM emissions from the shotblasting lines shall not exceed the emission limits listed in the table below:

Unit ID	PM Emission Limit (lbs/hr)
SBS-6	0.39
SBS-7	0.23
SBS-9	0.20
SBS-10	0.48
SBS-11	0.20
03-SBS-01	0.68
03-SBS-02	0.15
03-SBS-03	0.23
03-SBS-04	0.29
03-SBS-06	0.36

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following shotblasting lines shall not exceed the pound per hour limits listed in the table below:

Unit ID	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
SBS-6	3,239	5.66
SBS-7	1,900	3.96
SBS-9	1,640	3.59
SBS-10	4,000	6.52
SBS-11	1,640	3.59
03-SBS-01	5,670	8.24
03-SBS-02	1,280	3.04
03-SBS-03	1,920	3.99
03-SBS-04	2,403	4.64
03-SBS-06	3,008	5.39

The pounds per hour limitations were calculated using the following equations:

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

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

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Conditions D.1.1 and D.1.2, each of the following shotblasting lines shall be controlled by the associated scrubber, as listed in the table below, at all times when these units are in operation:

Unit ID	Scrubber ID
SBS-6	WDC-4
SBS-7	WDC-5
SBS-11	
SBS-9	WDC-2
SBS-10	
03-SBS-01	03-WDC-01
03-SBS-04	
03-SBS-02	03-WDC-02
03-SBS-03	
03-SBS-06	03-WDC-03

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

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the scrubber stack exhausts (stacks SV# WDC-5, WDC-2, WDC-4, 03-WDC-01, 03-WDC-02, and 03-WDC-03) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the pressure drop across each of the scrubbers used to control emissions from shotblasting lines at least once per day when the associated shotblasting lines are in operation. The pressure drop range and the minimum flow rate of the scrubber fluid for each scrubber are listed in the table below. When for any one reading, the pressure drop across the scrubber is outside the normal range, established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions and Exceedances contains

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

Scrubber ID	Process ID	Pressure Drop ranges (inches of water)	Minimum Flow Rate (gallons/min)
WDC-4	SBS-6	7.5-15.0	90
WDC-5	SBS-7 SBS-11	8-15	150
WDC-2	SBS-9 SBS-10	8-15	150
03-WDC-01	03-SBS-01 03-SBS-04	8-15	150
03-WDC-02	03-SBS-02 03-SBS-03	8-15	150
03-WDC-03	03-SBS-06	7.5-15.0	90

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

D.1.7 Scrubber Detection

Failed units and the associated process shall be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the visible emissions notations of the scrubber stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (i.e. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain the daily records of the pressure drop across the scrubbers controlling the shot blasters. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g., the process did not operate that day).
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (b) Eight (8) natural gas-fired aluminum melting furnaces, consisting of the following:
- (1) One (1) aluminum melting furnace, identified as MF-5, constructed in 1989, and approved for modification in 2012, with a maximum heat input capacity of 14.4 MMBtu/hr, with a maximum throughput rate of 10,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 10.0 pounds per hour, and exhausting through stack SV#MF-5.
 - (2) One (1) aluminum melting furnace, identified as MF-6, constructed in 1994, and approved for modification in 2012, with a maximum heat input capacity of 19.3 MMBtu/hr, with a maximum throughput rate of 15,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 15.0 pounds per hour, and exhausting through stack SV#MF-6.
 - (3) One (1) aluminum melting furnace, identified as MF-1S, constructed in 1998, and approved for construction in 2012, with a maximum heat input capacity of 15.0 MMBtu/hr, with a maximum throughput rate of 9,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 9.0 pounds per hour, and exhausting through stack SV#MF-1S.
 - (4) One (1) aluminum melting furnace, identified as MF-2M, constructed in 1998, and approved for construction in 2012, with a maximum heat input capacity of 23.8 MMBtu/hr, with a maximum throughput rate of 9,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 9.0 pounds per hour, and exhausting through stack SV#MF-2M.
 - (5) One (1) aluminum melting furnace, identified as MF-3N, constructed in 2000, and approved for construction in 2012, with a maximum heat input capacity of 13.4 MMBtu/hr, with a maximum throughput rate of 7,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 7.0 pounds per hour, and exhausting through stack SV#MF-3N.
 - (6) One (1) aluminum melting furnace, identified as MF-1, constructed in 2005, and approved for construction in 2012, with a maximum heat input capacity of 18.0 MMBtu/hr, with a maximum throughput rate of 15,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 15.0 pounds per hour, and exhausting through stack SV#MF-1.
 - (7) One (1) aluminum melting furnace, identified as MF-7, constructed in 2012, with a maximum heat input capacity of 13.4 MMBtu/hr, with a maximum throughput rate of 6,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 6.0 pounds per hour, and exhausting through stack SV#MF-7.
 - (8) One (1) aluminum melting furnace, identified as MF-8A, approved in 2014 for construction, with a maximum heat input capacity of 1.5 MMBtu/hr, with a maximum throughput rate of 1,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 2.5 pounds per hour, and exhausting through stack SV#MF-8.

(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 2-8-4(1)]

D.2.1 PM, PM10, PM2.5 Limits [326 IAC 2-8-4] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8 (FESOP), the annual throughput for melt furnaces MF-1, MF-1S, MF-2M, MF-3N, MF-5, MF-6, MF-7, and MF-8A shall not exceed 150,000 tons of aluminum per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (i) PM10 emissions from the melt furnaces MF-1, MF-1S, MF-2M, MF-3N, MF-5, MF-6, MF-7, and MF-8A shall not exceed 1.1 pounds per ton of aluminum charged.
 - (ii) PM2.5 emissions from the melt furnaces MF-1, MF-1S, MF-2M, MF-3N, MF-5, MF-6, MF-7, and MF-8A shall not exceed 1.1 pounds per ton of aluminum charged.

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

- (b) In order to render 326 IAC 2-2 not applicable, the PM emissions from the melt furnaces MF-1, MF-1S, MF-2M, MF-3N, MF-5, MF-6, MF-7, and MF-8A shall not exceed 1.1 pounds per ton of aluminum charged.

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

D.2.2 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the melting furnaces shall not exceed the following pounds per hour, when operating at the process weight rates shown below. The pound per hour limitation was calculated with the equation below.

Emission Unit	Metal Throughput (tons/hour)	Flux Throughput (tons/hour)	Total Process Weight Rate (tons/hour)	PM Emissions Limit (lbs/hr)
Melt Furnace MF-5	5.0	0.005	5.005	12.06
Melt Furnace MF-6	7.5	0.008	7.508	15.82
Melt Furnace MF-1S	4.5	0.005	4.505	11.23
Melt Furnace MF-2M	4.5	0.005	4.505	11.23
Melt Furnace MF-3N	3.5	0.004	3.504	9.49
Melt Furnace MF-1	7.5	0.008	7.508	15.82
Melt Furnace MF-7	3.0	0.003	3.003	8.56
Melt Furnace MF-8A	0.5	0.001	0.501	2.58

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

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

D.2.3 Material Usage [40 CFR 63, Subpart RRR]

The Permittee shall melt only clean charge aluminum ingots, or internally-generated clean scrap as defined in 40 CFR 63, Subpart RRR, in the melt furnaces at all times. Compliance with this condition shall render 40 CFR 63, Subpart RRR not applicable.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1)] [326 IAC 2-1.1-11]

In order to demonstrate the compliance status with Conditions D.2.1 and D.2.2, the Permittee shall perform PM, PM10, and PM2.5 testing for one of the melt furnaces, identified as MF-1, MF-5, MF-6, MF-1S, MF-2M, MF-3N, or MF-7, within 180 days of the issuance of this significant permit revision number 145-31356-00031. This testing shall be conducted utilizing methods as approved by the Commissioner. As long as the melt process does not change, and as long as the melt raw materials do not change, repeat testing is not required. Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of each melt furnace stack exhausts (stacks SV# MF-1, SV#MF-5, SV#MF-6, SV#MF-1S, SV#MF-2M, SV#MF-3N, SV#MF-7, and SV#MF-8A) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

- (a) In order to document the compliance status with Condition D.2.1(a), the Permittee shall maintain monthly records of the aluminum melted in each of the melt furnaces. The Permittee shall include in its monthly record when there is no entry and the reason for the lack of an entry (i.e. the melt furnace did not operate that day).
- (b) In order to document the compliance status with Condition D.2.6, the Permittee shall maintain monthly records of the visible emissions notations. The Permittee shall include

in its monthly record when there is no visible emissions notation and the reason for the lack of a record (i.e. the melt furnace did not operate that day).

- (c) Section C – General Record Keeping Requirements contains the Permittee’s obligation required by this condition.

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1(a) shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C – General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (b) Eight (8) natural gas-fired aluminum melting furnaces, consisting of the following:
- (1) One (1) aluminum melting furnace, identified as MF-5, constructed in 1989, and approved for modification in 2012, with a maximum heat input capacity of 14.4 MMBtu/hr, with a maximum throughput rate of 10,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 10.0 pounds per hour, and exhausting through stack SV#MF-5.
 - (2) One (1) aluminum melting furnace, identified as MF-6, constructed in 1994, and approved for modification in 2012, with a maximum heat input capacity of 19.3 MMBtu/hr, with a maximum throughput rate of 15,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 15.0 pounds per hour, and exhausting through stack SV#MF-6.
 - (3) One (1) aluminum melting furnace, identified as MF-1S, constructed in 1998, and approved for construction in 2012, with a maximum heat input capacity of 15.0 MMBtu/hr, with a maximum throughput rate of 9,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 9.0 pounds per hour, and exhausting through stack SV#MF-1S.
 - (4) One (1) aluminum melting furnace, identified as MF-2M, constructed in 1998, and approved for construction in 2012, with a maximum heat input capacity of 23.8 MMBtu/hr, with a maximum throughput rate of 9,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 9.0 pounds per hour, and exhausting through stack SV#MF-2M.
 - (5) One (1) aluminum melting furnace, identified as MF-3N, constructed in 2000, and approved for construction in 2012, with a maximum heat input capacity of 13.4 MMBtu/hr, with a maximum throughput rate of 7,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 7.0 pounds per hour, and exhausting through stack SV#MF-3N.
 - (6) One (1) aluminum melting furnace, identified as MF-1, constructed in 2005, and approved for construction in 2012, with a maximum heat input capacity of 18.0 MMBtu/hr, with a maximum throughput rate of 15,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 15.0 pounds per hour, and exhausting through stack SV#MF-1.
 - (7) One (1) aluminum melting furnace, identified as MF-7, constructed in 2012, with a maximum heat input capacity of 13.4 MMBtu/hr, with a maximum throughput rate of 6,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 6.0 pounds per hour, and exhausting through stack SV#MF-7.
 - (8) One (1) aluminum melting furnace, identified as MF-8A, approved in 2014 for construction, with a maximum heat input capacity of 1.5 MMBtu/hr, with a maximum throughput rate of 1,000 pounds of aluminum ingots and internally-generated aluminum scrap per hour, and with a maximum flux usage of 2.5 pounds per hour, and exhausting through stack SV#MF-8.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One hundred and six (106) natural gas-fired combustion units in Plant 1, with a total heat capacity of 109.77 MMBtu/hr, including the following:
 - (A) Three (3) pre-heat stations, each with a maximum heat input of 0.008 MMBtu/hr.
 - (B) One (1) make-up air unit, with a maximum heat input of 1.02 MMBtu/hr.
 - (C) Three (3) make-up air units, each with a maximum heat input of 1.972 MMBtu/hr.
 - (D) One (1) make-up air unit, with a maximum heat input of 2.066 MMBtu/hr.
 - (E) Four (4) make-up air units, each with a maximum heat input of 2.137 MMBtu/hr.
 - (F) Eleven (11) make-up air units, each with a maximum heat input of 2.1875 MMBtu/hr.
 - (G) Two (2) make-up air units, each with a maximum heat input of 2.324 MMBtu/hr.
 - (H) One (1) make-up air unit, with a maximum heat input of 2.5 MMBtu/hr.
 - (I) Two (2) make-up air units, each with a maximum heat input of 3.052 MMBtu/hr.
 - (J) Six (6) make-up air units, each with a maximum heat input of 3.327 MMBtu/hr.
 - (K) One (1) make-up air unit, with a maximum heat input of 4.1 MMBtu/hr.
 - (L) One (1) make-up air unit, with a maximum heat input of 5 MMBtu/hr.
 - (M) Fifty-one (51) space unit heaters, each with a maximum heat input of 0.1 MMBtu/hr.
 - (N) Ten (10) door heaters, each with a maximum heat input of 0.4 MMBtu/hr.
 - (O) One (1) office heater, with a maximum heat input of 0.215 MMBtu/hr.
 - (P) One (1) office heater, with a maximum heat input of 0.16 MMBtu/hr.
 - (Q) One (1) make-up air unit, with a maximum heat input of 0.009 MMBtu/hr.
 - (R) Three (3) make-up air units, each with a maximum heat input of 2.629 MMBtu/hr.
 - (S) Three (3) make-up air units, each with a maximum heat input of 2.817 MMBtu/hr.
 - (2) Fourteen (14) natural gas-fired combustion units in Plant 2, with a total heat capacity of 11.12 MMBtu/hr, including the following:
 - (A) One (1) make-up air unit, with a maximum heat input of 0.75 MMBtu/hr.
 - (B) One (1) air curtain, with a maximum heat input of 3.5 MMBtu/hr.
 - (C) One (1) air curtain, with a maximum heat input of 3.0 MMBtu/hr.
 - (D) One (1) air curtain, with a maximum heat input of 2.203 MMBtu/hr.

- (E) Nine (9) space unit heaters, each with a maximum heat input of 0.2 MMBtu/hr.
- (F) One (1) office heater, with a maximum heater input of 0.0514 MMBtu/hr.
- (3) Eighty-eight (88) natural gas-fired combustion units in Plant 3 (with no back-up fuel), with a total heat capacity of 117.12 MMBtu/hr, including the following:
 - (A) Two (2) pre-heat stations, each with a maximum heat input of 2.0 MMBtu/hr.
 - (B) Six (6) door heaters, each with a maximum heat input of 0.4 MMBtu/hr.
 - (C) Eight (8) door heaters, each with a maximum heat input of 0.814 MMBtu/hr.
 - (D) One (1) make-up air unit, with a maximum heat input of 0.751 MMBtu/hr.
 - (E) Two (2) make-up air units, each with a maximum heat input of 1.503 MMBtu/hr.
 - (F) Six (6) make-up air units, each with a maximum heat input of 1.784 MMBtu/hr.
 - (G) One (1) make-up air unit, with a maximum heat input of 1.972 MMBtu/hr.
 - (H) Three (3) make-up air units, each with a maximum heat input of 2.536 MMBtu/hr.
 - (I) Four (4) make-up air units, each with a maximum heat input of 3.287 MMBtu/hr.
 - (J) Sixteen (16) make-up air units, each with a maximum heat input of 3.945 MMBtu/hr.
 - (K) Thirty-nine (39) space unit heaters, each with a maximum heat input of 0.1 MMBtu/hr.
- (4) Seven (7) natural gas-fired combustion units in Plant 4, with a total heat capacity of 1.5 MMBtu/hr, including the following:
 - (A) Five (5) unit heaters, each with a maximum heat input of 0.216 MMBtu/hr.
 - (B) One (1) door heater, with a maximum heat input of 0.39 MMBtu/hr.
 - (C) One (1) AC/heater, with a maximum heat input of 0.031 MMBtu/hr.

(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 2-8-4(1)]

D.3.1 FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the amount of natural gas used in all the melting furnaces MF-1, MF-5, MF-6, MF-1S, MF-2M, MF-3N, MF-7, and MF-8A, and all insignificant combustion units at Plants 1, 2, 3, and 4, excluding the emergency generator, shall not exceed 1461.2 million cubic feet (MMCF) per twelve (12) consecutive month period with compliance determined at the end of each month and:

- (1) NOx emissions shall not exceed 100 lb per MMCF.
- (2) CO emissions shall not exceed 84 lb per MMCF.

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.2 Record Keeping Requirements

- (a) To document the compliance status with the Condition D.3.1, the Permittee shall maintain monthly records of the total natural gas usage of the entire source, except for the emergency generator.
- (b) Section C - General Record Keeping Requirements, contains the Permittee's obligation with regard to the records required by this condition.

D.3.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (d) One (1) aluminum die casting process, constructed in 1986, with a maximum throughput rate of 27.5 tons of parts per hour.

(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 2-8-4(1)]

There are no specific applicable requirements for the unit at this time.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Insignificant Activities

- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (d) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (e) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (f) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (g) Cleaners and solvents that contain less than one percent (1%) of VOC by weight.
- (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (i) Quenching operations used with heat treating processes.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Paved roads and parking lots with public access.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) Stationary fire pumps.
- (n) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(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 2-8-4(1)]

D.5.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from each of the brazing, cutting, soldering and welding processes shall not exceed the pounds per hour emission rate calculated based on the following equation:

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

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

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (o) One (1) natural gas-fired emergency generator, considered a spark ignition internal combustion engine, manufactured after 2006, constructed in 2010, with a maximum heat input capacity of 0.29 MMBtu/hr, using no controls, and exhausting inside the building.

Under 40 CFR 60, Subpart JJJJ, this is considered an affected source.

Under 40 CFR 63, Subpart ZZZZ, this is considered an affected source.

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

New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines [40 CFR 60, Subpart JJJJ]

E.1.1 New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines [40 CFR 60, Subpart JJJJ]

Pursuant to 40 CFR 60, the Permittee shall comply with the provisions of New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines [40 CFR 60, Subpart JJJJ], which are incorporated by reference as 326 IAC 12. The provisions of 40 CFR 60, Subpart JJJJ are shown in their entirety in Attachment A to this permit.

Applicable portions of the NSPS are the following:

- (a) 40 CFR 60.4230(4)(iii),(iv)
- (b) 40 CFR 60.4233(d),(h)
- (c) 40 CFR 60.4234
- (d) 40 CFR 60.4243(a)(1),(a)(2),(b)(1)
- (e) 40 CFR 60.4245(a),(d)
- (f) 40 CFR 60.4246
- (g) 40 CFR 60.4248
- (h) 40 CFR 60, Tables 2, 3

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the emergency generator except as otherwise specified in 40 CFR 60, Subpart JJJJ.

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (o) One (1) natural gas-fired emergency generator, considered a spark ignition internal combustion engine, manufactured after 2006, constructed in 2010, with a maximum heat input capacity of 0.29 MMBtu/hr, using no controls, and exhausting inside the building;

Under 40 CFR 60, Subpart JJJJ, this is considered an affected source.

Under 40 CFR 63, Subpart ZZZZ, this is considered an affected source.

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

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements for Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

E.2.1 National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

Pursuant to 40 CFR 63, the Permittee shall comply with the provisions of National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ, which are incorporated by reference as 326 IAC 20, as specified as follows., which are incorporated by reference as 326 IAC 20, as specified as follows. The provisions of 40 CFR 63, Subpart ZZZZ are shown in their entirety in Attachment B to this permit.

- (a) 40 CFR 63.6580
- (b) 40 CFR 63.6585
- (c) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
- (d) 40 CFR 63.6595(a)(7)
- (e) 40 CFR 63.6665
- (f) 40 CFR 63.6670
- (g) 40 CFR 63.6675

Pursuant to 40 CFR 63.6665, the natural gas-fired emergency generator does not have to meet the requirements of 40 CFR 63, Subpart A (General Provisions), since it is considered a new stationary RICE located at an area source of HAP emissions.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Ryobi Die Casting U.S.A., Inc.
Source Address: 800 West Mausoleum Road, Shelbyville, Indiana 46176
FESOP Permit No.: F145-30081-00031

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Ryobi Die Casting U.S.A., Inc.
Source Address: 800 West Mausoleum Road, Shelbyville, Indiana 46176
FESOP Permit No.: F145-30081-00031

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Ryobi Die Casting U.S.A., Inc.
Source Address: 800 West Mausoleum Road, Shelbyville, Indiana 46176
FESOP Permit No.: F145-31356-00031
Facility: Melt Furnaces MF-1, MF-5, MF-6, MF-1S, MF-2M, MF-3N, MF-7, and MF-8A
Parameter: Total Aluminum charged
Limit: Annual throughput not to exceed 150,000 tons per twelve (12) consecutive months with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

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

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

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

FESOP Quarterly Report

Source Name: Ryobi Die Casting U.S.A., Inc.
Source Address: 800 West Mausoleum Road, Shelbyville, Indiana 46176
FESOP Permit No.: F145-31356-00031
Facility: Melt Furnaces MF-1, MF-5, MF-6, MF-1S, MF-2M, MF-3N, MF-7, and MF-8A;
Insignificant Combustion Units in Plants 1, 2, 3, and 4 (excluding the emergency generator)
Parameter: Source-wide Natural Gas Usage
Limit: Not to exceed 1461.2 MMCF per twelve (12) consecutive months with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (mmcf)	Previous 11 Months (mmcf)	12 Month Total (mmcf)
Month 1			
Month 2			
Month 3			

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

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

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

Source Name: Ryobi Die Casting U.S.A., Inc.
Source Address: 800 West Mausoleum Road, Shelbyville, Indiana 46176
FESOP Permit No.: F145-30081-00031

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Description and Location

Source Name:	Ryobi Die Casting U.S.A., Inc.
Source Location:	800 W. Mausoleum Road, Shelbyville, IN 46176
County:	Shelby
SIC Code:	3363 (Aluminum Die Castings)
Operation Permit No.:	F145-30081-00031
Operation Permit Issuance Date:	August 23, 2011
Administrative Amendment No.:	145-35824-00031
Permit Reviewer:	Charles Sullivan

On May 13, 2015, the Office of Air Quality (OAQ) received an application from Ryobi Die Casting U.S.A. Inc. related to administrative changes to an existing stationary aluminum die casting plant.

Existing Approvals

The source was issued FESOP Renewal No. F145-30081-00031 on August 23, 2011. The source has since received the following approvals:

- (a) Significant Permit Revision No. 145-31356-00031, issued on June 28, 2012;
- (b) Administrative Amendment No. 145-33567-00031, issued on September 13, 2013;
- (c) Administrative Amendment No. 145-33814-00031, issued on November 25, 2013; and
- (d) Administrative Amendment No. 145-34530-00031, issued on July 28, 2014.

County Attainment Status

The source is located in Shelby 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}	Unclassifiable or attainment effective April 5, 2005, 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.

¹Unclassifiable 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. Shelby 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.

Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	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".
 (1) PM Emissions from shotblast units are controlled from the scrubbers at 98.8% efficiency.
 (2) Melt process emissions are based on limited throughput of aluminum.
 (3) Combustion emissions are limited from source-wide annual usage limits for natural gas, less the emergency generator.

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, 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).

Description of Proposed Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Ryobi Die Casting U.S.A., Inc. on May 13, 2015, relating to the following administrative changes and addition of one (1) air make-up unit:

1. The modification of make-up air units (MAU-37, MAU-38, and MAU-39) from 21,000 CFM and 2.1875 MMBTU per hour heat input to 28,000 CFM and 2.629 MMBTU per hour heat input, each;
2. The modification of make-up air units (MAU-5 and MAU-8) from 21,000 CFM and 2.1875 MMBTU per hour heat input to 30,000 CFM and 2.817 MMBTU per hour heat input each;
3. The removal of non-applicable permit requirements.

The following is the new emission unit:

One (1) make-up air unit, identified as MAU-43, installed in 2015, with a maximum heat input capacity of 2.817 MMBTU per hour.

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 – FESOP Amendment

The following table is used to determine the appropriate permit level under 326 IAC 2-8-10 Administrative Permit Amendments. 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
Air Make-up Unit MAU-37*	negl.	0.01	0.01	negl.	0.19	0.01	0.16	negl.	negl. Hexane
Air Make-up Unit MAU-38*	negl.	0.01	0.01	negl.	0.19	0.01	0.16	negl.	negl. Hexane
Air Make-up Unit MAU-39*	negl.	0.01	0.01	negl.	0.19	0.01	0.16	negl.	negl. Hexane
Air Make-up Unit MAU-5**	0.01	0.02	0.02	negl.	0.27	0.01	0.23	0.01	0.005 Hexane
Air Make-up Unit MAU-8**	0.01	0.02	0.02	negl.	0.27	0.01	0.23	0.01	0.005 Hexane
Air Make-up Unit MAU-43	0.02	0.09	0.09	0.01	1.21	0.07	1.02	0.02	0.02 Hexane
Total PTE of Proposed Amendment	0.04	0.18	0.18	0.01	2.32	0.13	1.95	0.04	0.04 Hexane
negl. = negligible									
* PTE increase due to MMBtu/hr change from 2.1875 to 2.629.									
** PTE increase due to MMBtu/hr change from 2.1875 to 2.817.									

Pursuant to 326 IAC 2-8-10(a)(2)(B), this change to the permit is considered an administrative amendment because the permit is amended to change descriptive information concerning the source or an emissions unit, where the revision will not trigger a new applicable requirement.

Pursuant to 326 IAC 2-8-10(a)(10), this change to the permit is considered an administrative amendment because the permit is amended to incorporate a modification that adds an emissions unit of the same type that is already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 (PSD) or 326 IAC 2-3 (Emission Offset).

PTE of the Entire Source After Issuance of the FESOP Amendment

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

Process/ Emission Unit	Potential To Emit of the Entire Source Prior Issuance of the FESOP Administrative Amendment (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Process Emissions									
Shot Blast Units	14.03	9.90	9.90	0.00	0.00	0.00	0.00	0.00	NA
Melt Furnace Process Emissions	82.50	82.50	82.50	0.00	0.00	0.00	0.00	7.73	7.73 (HF)
Die Casting process	0.00	0.00	0.00	2.41	1.20	0.00	0.00	0.00	NA
Insignificant Activities	1.00	1.00	1.00	0.00	1.00	1.00	negl.	0.00	NA
Combustion Units Emissions									
Melt Furnace Combustion	1.39	5.55	5.55	0.44	73.06	4.02	61.37	1.38	1.32 (Hexane)
Plant 1 Insignificant Combustion Units									
Plant 2 Insignificant Combustion Units									
Plant 3 Insignificant Combustion Units									
Plant 4 Insignificant Combustion Units									
Emergency Generator Combustion Unit	0.003	0.003	0.003	negl.	0.30	0.01	0.27	negl.	negl.
Total PTE of Entire Source	98.92	98.95	98.95	2.85	75.56	5.03	61.64	9.11	7.73 (HF)
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
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	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".

(1) PM Emissions from shotblast units are controlled from the scrubbers at 98.8% efficiency.

(2) Melt process emissions are based on limited throughput of aluminum.

(3) Combustion emissions are limited from source-wide annual usage limits for natural gas, less the emergency generator.

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) FESOP Status

This amendment to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants and HAPs from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

The entire source will continue to limit the amount of natural gas used in all the melting furnaces MF-1, MF-5, MF-6, MF-1S, MF-2M, MF-3N, MF-8, and MF-9, and all insignificant combustion units at Plants 1, 2, 3, and 4, excluding the emergency generator, to less than 1461.2 million cubic feet (MMCF) per twelve (12) consecutive month period with compliance determined at the end of each month, rendering the requirements of 326 IAC 2-7 (Part 70) not applicable (see Appendix A for the emission calculations).

Federal Rule Applicability Determination

(a) New Source Performance Standards (NSPS)

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)

There are no 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 potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

(a) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

Each of the new/modified natural gas-fired make-up air units is not subject to the requirements of 326 IAC 6-2, because they each are not an indirect heating unit.

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

Each of the new/modified natural gas-fired make-up air units is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), each of the new/modified natural gas-fired make-up air units is also exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions of less than five hundred fifty one thousandths (0.551) pound per hour.

(c) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, each of the new/modified natural gas-fired make-up air units is not subject to the requirements of 326 IAC 7-1.1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

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

Each of the new/modified natural gas-fired make-up air units is not subject to the requirements of 326 IAC 8-1-6, since the potential unlimited VOC emissions from each unit is less than twenty-five (25) tons per year.

Compliance Determination, Monitoring and Testing Requirements

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 FESOP No: F145-30081-00031, issued on August 23, 2011.

Proposed Changes

1. Due to their greenhouse gas emissions, the source was previously required to either take federally enforceable limits to limit their potential to emit CO₂ equivalent (CO₂e) emissions below 100,000 tons per year, or to obtain a Part 70 Operating Permit. The source opted to take federally enforceable limits to limit their CO₂e emissions below 100,000 tons per year and was issued FESOP Renewal No. F145-30081-00031 on August 23, 2011, which contained these limits.

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Based on the United States Supreme Court ruling in *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, IDEM, OAQ is removing the CO₂e emissions limits from the permit.

2. The source only uses cleaners and solvents containing less than one percent (1%) of VOC by weight in its degreasing and cleaning operations. Pursuant to 326 IAC 8-3-1(d)(1)(B), degreasers that use solvents that contain less than one percent (1%) of VOC by weight are exempt from the requirements of 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-1(d)(2)(C), the requirements of 326 IAC 8-3-8 do not apply to solvents containing less than one percent (1%) VOC by weight used in degreasers that are not located in Clark, Floyd, Lake, or Porter County. The source is located in Shelby County. Therefore, the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-8 are not applicable to the source and are being removed from the permit.

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

....

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour each:

- (1) ~~One hundred and five (105)~~ **One hundred and six (106)** natural gas-fired combustion units in Plant 1, with a total heat capacity of ~~404.37~~ **109.77** MMBtu/hr, including the following:

....

(F) ~~Sixteen (16)~~ **Eleven (11)** make-up air units, each with a maximum heat input of 2.1875 MMBtu/hr.

....

(R) **Three (3)** make-up air units, each with a maximum heat input of 2.629 MMBtu/hr.

(S) **Three (3)** make-up air units, each with a maximum heat input of 2.817 MMBtu/hr.

....

....

(g) Cleaners and solvents having a vapor pressure equal to or less than 2kPa (15mm Hg or 0.3 psi) measured at 38 degrees C (100oF) or a vapor pressure equal to or less than 0.7 kPa (5mm Hg, or 0.1 psi) measured at 20oC (68oF), the use of which for all cleaners and solvents combined does not exceed 145 gallons per twelve (12) consecutive month period that contain less than one percent (1%) of VOC by weight.

....

SECTION D.1 ~~FACILITY~~ **EMISSIONS UNIT** OPERATION CONDITIONS

....

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

....

SECTION D.3 ~~FACILITY~~ **EMISSIONS UNIT** OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

....

Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) ~~One hundred and five (105)~~ **One hundred and six (106)** natural gas-fired combustion units in Plant 1, with a total heat capacity of ~~404.37~~ **109.77** MMBtu/hr, including the following:

....

(F) ~~Sixteen (16)~~ **Eleven (11)** make-up air units, each with a maximum heat input of 2.1875 MMBtu/hr.

....

(R) **Three (3)** make-up air units, each with a maximum heat input of 2.629 MMBtu/hr.

(S) **Three (3)** make-up air units, each with a maximum heat input of 2.817 MMBtu/hr.

....

....

D.3.1 FESOP Limits [326 IAC 2-8-4] ~~[326 IAC 2-2]~~

~~(a)~~ Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the amount of natural gas used in all the melting furnaces MF-1, MF-5, MF-6, MF-1S, MF-2M, MF-3N, MF-7, and MF-8A, and all insignificant combustion units at Plants 1, 2, 3, and 4, excluding the emergency generator, shall not exceed 1461.2 million cubic feet (MMCF) per twelve (12) consecutive month period with compliance determined at the end of each month and:

- (1) NOx emissions shall not exceed 100 lb per MMCF.
- (2) CO emissions shall not exceed 84 lb per MMCF.

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

- ~~(3) CO₂ emissions from these combustion units shall not exceed 120,000 lb/mmcf.~~
- ~~(4) CH₄ emissions from these combustion units shall not exceed 2.3 lb/mmcf.~~
- ~~(5) N₂O emissions from these combustion units shall not exceed 2.2 lb/mmcf.~~
- ~~(6) Global Warming Potential (GWP) for CO₂ shall not exceed 1.~~
- ~~(7) Global Warming Potential (GWP) for CH₄ shall not exceed 21.~~
- ~~(8) Global Warming Potential (GWP) for N₂O shall not exceed 310.~~

~~Compliance with these limits, combined with the limited potential to emit CO₂e emissions from all other existing units at this source, shall limit the source-wide total potential to emit of CO₂e to less than 100,000 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2, not applicable.~~

....

SECTION D.4 FACILITY EMISSIONS UNIT OPERATION CONDITIONS

....

SECTION D.5 FACILITY EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Insignificant Activities

....

- ~~(g) Cleaners and solvents having a vapor pressure equal to or less than 2kPa (15mm Hg or 0.3 psi) measured at 38 degrees C (100°F) or a vapor pressure equal to or less than 0.7 kPa (5mm Hg, or 0.1 psi) measured at 20°C (68°F), the use of which for all cleaners and solvents combined does not exceed 145 gallons per twelve (12) consecutive month period **that contain less than one percent (1%) of VOC by weight.**~~

....

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

~~D.5.1 Cold Cleaner Degreaser Control and Operating Requirements [326 IAC 8-3-2]~~

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall:~~

- ~~(a) Ensure the following control equipment and operating requirements are met:~~
 - ~~(1) Equip the degreaser with a cover.~~

- ~~(2) Equip the degreaser with a device for draining cleaned parts.~~
- ~~(3) Close the degreaser cover whenever parts are not being handled in the degreaser.~~
- ~~(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.~~
- ~~(5) Provide a permanent, conspicuous label that lists the operating requirements in (3), (4), (6), and (7) of this condition.~~
- ~~(6) Store waste solvent only in closed containers.~~
- ~~(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.~~

~~D.5.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]~~

~~Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).~~

~~D.5.31 Particulate [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from each of the brazing, cutting, soldering and welding processes shall not exceed the pounds per hour emission rate calculated based on the following equation:~~

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

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

~~Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]~~

~~D.5.4 Record Keeping Requirements~~

~~To document the compliance status with Condition D.5.2, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.~~

- ~~(a) The name and address of the solvent supplier.~~
- ~~(b) The date of purchase.~~
- ~~(c) The type of solvent purchased.~~
- ~~(d) The total volume of the solvent purchased.~~
- ~~(e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).~~

....

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 May 13, 2015.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Charles Sullivan 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) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.
- (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 Summary

Company Name: Ryobi Die Casting U.S.A., Inc.
 Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
 FESOP Renewal No.: 145-30081-00031
 FESOP AA No.: 145-35824-00031
 Reviewer: C. Sullivan
 Date: 6-Jun-15

Emission Unit	Unlimited Potential Emissions (tons/yr)									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst HAP	HAP
<u>Process Emissions</u>										
Shot Blast Units	1169.46	116.95	116.95	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Melt Furnace Process Emissions	173.45	173.45	173.45	0.00	0.00	0.00	0.00	7.73	7.73	HF
Die Casting process	0.00	0.00	0.00	2.41	1.20	0.00	0.00	0.00	0.00	N/A
Insignificant Activities	1.00	1.00	1.00	0.00	1.00	1.00	negl.	0.00	0.00	N/A
<u>Combustion Units Emissions</u>										
Melt Furnace Combustion	0.99	3.95	3.95	0.31	52.03	2.86	43.71	9.82E-01	9.37E-01	Hexane
Plant 1 Insignificant Combustion Units	0.91	3.65	3.65	0.29	48.08	2.6	40.39	9.07E-01	8.65E-01	Hexane
Plant 2 Insignificant Combustion Units	0.09	0.38	0.38	0.03	4.95	0.27	4.16	9.34E-02	8.91E-02	Hexane
Plant 3 Insignificant Combustion Units	0.97	3.90	0.05	0.31	51.30	2.82	43.09	9.68E-01	9.23E-01	Hexane
Plant 4 Insignificant Combustion Units	0.01	0.05	0.05	0.00	0.66	0.04	0.55	1.24E-02	1.18E-02	Hexane
Emergency Generator Combustion Unit	0.003	0.003	0.003	0.00	0.30	0.01	0.27	5.42E-03	4.00E-03	Formaldehyde
Source Total Unlimited Potential to Emit	1346.89	303.33	299.48	3.35	159.52	9.64	132.17	10.70	7.73	HF

Emission Unit	Limited / Controlled Potential Emissions (tons/yr)									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst HAP	HAP
<u>Process Emissions</u>										
Shot Blast Units*	14.03	9.90	9.90	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Melt Furnace Process Emissions**	82.50	82.50	82.50	0.00	0.00	0.00	0.00	7.73	7.73	HF
Die Casting process	0.00	0.00	0.00	2.41	1.20	0.00	0.00	0.00	0.00	N/A
Insignificant Activities	1.00	1.00	1.00	0.00	1.00	1.00	negl.	0.00	0.00	N/A
<u>Combustion Units Emissions***</u>										
Melt Furnace Combustion	1.39	5.55	5.55	0.44	73.06	4.02	61.37	#REF!	1.32	Hexane
Plant 1 Insignificant Combustion Units										
Plant 2 Insignificant Combustion Units										
Plant 3 Insignificant Combustion Units										
Plant 4 Insignificant Combustion Units	0.003	0.003	0.003	0.00	0.30	0.01	0.27	5.42E-03	4.00E-03	Formaldehyde
Source Total Limited Potential to Emit	98.92	98.95	98.95	2.85	75.56	5.03	61.64	9.05	7.73	HF

* - Emissions from shot blast units are controlled emissions from the scrubbers at 98.8% efficiency.

** Melt process emissions are based on limited throughput of aluminum.

*** Combustion emissions are limited emissions from sourcewide annual usage limits for natural gas, less the emergency generator fuel usage.

Appendix A: Emissions Calculations

Natural Gas Combustion Only
MM BTU/HR <100
Modified Air Make-up Units
(MAU-37, MAU-38, MAU-39, MAU-5, MAU-8 and MAU-43)

Company Name: Ryobi Die Casting U.S.A., Inc.
Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
FESOP Renewal No.: 145-30081-00031
FESOP AA No.: 145-35824-00031
Reviewer: C. Sullivan
Date: 5/13/2014

Unit IDs	Increase in Heat Input Capacity (MMBtu/hr)	HHV	Potential Throughput MMCF/yr
		mmBtu	
		mmscf	
MAU-37	0.4415	1020	3.8
MAU-38	0.4415		3.8
MAU-39	0.4415		3.8
MAU-5	0.6295		5.4
MAU-8	0.6295		5.4
MAU-43	2.817		24.2
	5.40		46.4

Emission Factor in lbs/MMCF	Pollutant						
	PM	PM10*	PM2.5*	SO ₂	**NO _x	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84.0
Unit ID	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)	direct PM2.5* (tons/yr)	PTE of SO ₂ (tons/yr)	PTE of NO _x (tons/yr)	PTE of VOC (tons/yr)	PTE of CO (tons/yr)
MAU-37	3.60E-03	0.01	0.01	1.14E-03	0.19	0.01	0.16
MAU-38	3.60E-03	0.01	0.01	1.14E-03	0.19	0.01	0.16
MAU-39	3.60E-03	0.01	0.01	1.14E-03	0.19	0.01	0.16
MAU-5	0.01	0.02	0.02	1.62E-03	0.27	0.01	0.23
MAU-8	0.01	0.02	0.02	1.62E-03	0.27	0.01	0.23
MAU-43	0.02	0.09	0.09	0.01	1.21	0.07	1.02
Total	0.04	0.18	0.18	0.01	2.32	0.13	1.95

*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 NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x 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/MM	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 ton	4.870E-05	2.783E-05	1.739E-03	4.174E-02	7.885E-05	4.364E-02

Emission Factor in lb/MM	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 ton	1.160E-05	2.551E-05	3.247E-05	8.812E-06	4.870E-05	1.271E-04
						Total HAPs 0.04
						Worst HAP 0.04

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.

Revision Summary Emissions

Company Name: Ryobi Die Casting U.S.A., Inc.
 Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
 FESOP Renewal No.: 145-30081-00031
 FESOP AA No.: 145-35824-00031
 Reviewer: C. Sullivan
 Date: 6-Jun-15

Emission Unit	Potential Emissions (tons/yr)								Total HAPs	Worst HAP
	PM	PM10	PM2.5	NOx	SO2	VOC	CO			
Air Make-up Unit MAU-37	3.60E-03	0.01	0.01	0.19	1.14E-03	0.01	0.16	0.04	0.04	
Air Make-up Unit MAU-38	3.60E-03	0.01	0.01	0.19	1.14E-03	0.01	0.16			
Air Make-up Unit MAU-39	3.60E-03	0.01	0.01	0.19	1.14E-03	0.01	0.16			
Air Make-up Unit MAU-5	0.01	0.02	0.02	0.27	1.62E-03	0.01	0.23			
Air Make-up Unit MAU-8	0.01	0.02	0.02	0.27	1.62E-03	0.01	0.23			
Air Make-up Unit MAU-43	0.02	0.09	0.09	1.21	0.01	0.07	1.02			
Total	0.04	0.18	0.18	2.32	0.01	0.13	1.95	0.04	0.04	

Hexane

**Appendix A: Emissions Calculations
PM, PM10/PM2.5 Emissions
From 10 Shotblasting Lines**

Company Name: Ryobi Die Casting U.S.A., Inc.

Address: 800 W. Mausoleum Road, Shelbyville, IN 46176

FESOP Renewal No.: 145-30081-00031

FESOP AA No.: 145-35824-00031

Reviewer: C. Sullivan

Date: 6-Jun-15

Unit ID	Max. throughput Rate (lbs/hr)	PM Emission Factor (lbs/lbs)	PTE of PM before Control (lbs/hr)	PTE of PM before Control (tons/yr)	PM10/PM2.5 Emission Factor (lbs/lbs PM)	PTE of PM10/PM2.5 before Control (lbs/hr)	PTE of PM10/PM2.5 before Control (tons/yr)	Scrubber ID	Control Efficiency	PTE of PM after Control (lbs/hr)	PTE of PM after Control (tons/yr)	PTE of PM10/PM2.5 after Control (lbs/hr)	PTE of PM10/PM2.5 after Control (tons/yr)
SBS-6	3,239	0.01	32	142	0.10	3	14	WDC-4	98.80%	0.39	1.70	0.27	1.18
SBS-7	1,900	0.01	19	83	0.10	2	8	WDC-5	98.80%	0.23	1.00	0.16	0.70
SBS-9	1,640	0.01	16	72	0.10	2	7	WDC-2	98.80%	0.20	0.86	0.14	0.61
SBS-10	4,000	0.01	40	175	0.10	4	18	WDC-23	98.80%	0.48	2.10	0.34	1.49
SBS-11	1,640	0.01	16	72	0.10	2	7	WDC-5	98.80%	0.20	0.86	0.14	0.61
03-SBS-01	5,670	0.01	57	248	0.10	6	25	03-WDC-01	98.80%	0.68	2.98	0.48	2.10
03-SBS-02	1,280	0.01	13	56	0.10	1	6	03-WDC-02	98.80%	0.15	0.67	0.11	0.48
03-SBS-03	1,920	0.01	19	84	0.10	2	8	03-WDC-02	98.80%	0.23	1.01	0.16	0.70
03-SBS-04	2,403	0.01	24	105	0.10	2	11	03-WDC-01	98.80%	0.29	1.26	0.20	0.88
03-SBS-06	3,008	0.01	30	132	0.10	3	13	03-WDC-03	98.80%	0.36	1.58	0.26	1.14
Total				1,169.46			116.95				14.03		9.90

* The emission factors are from grit blasting from Air Quality Permits, Vol.1, Section 3 "Abrasive Blasting" (1991 Edition) by Stappa Alapco.

PM10 and PM2.5 limited emissions are based on a control efficiency of 91.5%.

PM limited emissions are based on a control efficiency of 98.8%.

Methodology

PTE of PM before Control (lbs/hr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs)

PTE of PM before Control (tons/yr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs

PTE of PM10 before Control = Potential PM Emissions x PM10 Emission Factor

PTE of PM/PM10 after Control = PTE of PM/PM10 before Control x (1 - Control Efficiency)

Company Name: Ryobi Die Casting U.S.A., Inc.
 Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
 FESOP Renewal No.: 145-30081-00031
 FESOP AA No.: 145-35824-00031
 Reviewer: C. Sullivan
 Date: 6-Jun-15

Furnace	Throughput (lb/hr)			MMBtu/hr	MMCF/yr
	Metal	Flux	Total		
MF-5	10,000	10.0	10,010	14.4	126.1
MF-6	15,000	15.0	15,015	19.3	169.1
MF-1S	9,000	9.0	9,009	15.0	131.4
MF-2M	9,000	9.0	9,009	23.8	208.5
MF-3N	7,000	7.0	7,007	13.4	117.4
MF-1	15,000	15.0	15,015	18.0	157.7
MF-7	6,000	6.0	6,006	13.4	117.4
MF-8A	1,000	2.5	1,003	1.5	13.1
TOTAL	72,000	73.5	72,074	118.8	1040.7

MMFC/yr = MMBtu/hr x 8760 hr/yr / 1000

Furnace Process Emissions

TYPE OF MATERIAL	Throughput			Capacity million British thermal units per hour/hr	Capacity mmcf/hr	Flux Usage (lb/hr)	
	LBS/HR	1 TON/2000 lbs	TON/HR				
Aluminum	72,000	2000	36.00	118.80	0.1188		
	PM	PM10/PM2.5	SOx	NOx	VOC	CO	HF
lb/ton	1.10	1.10	--	--	--	--	0.024
lb/mmcf	--	--	0	0	0	0.00	
Potential Emissions lbs/hr	39.60	39.60	0.00	0.00	0.00	0.00	1.76
Potential Emissions tons/year	173.45	173.45	0.00	0.00	0.00	0.00	7.73

Source of Emission Factors: STAPPA/ALAPCO Handbook, Volume 1, Section 11.3, Table 11-2. PM and PM10 emission factors include both metal throughput and additive throughput. The throughput includes the aluminum throughput shown in the Throughput Chart on this page. The flux contains HF. HF emission factor is from Material Safety Data Sheets (MSDS) provided by source. Throughput per hour and maximum heat input capacity were provided by the source in its application.

Methodology:

PM/PM10/PM2.5 Emissions (lb/hr) = Emission Factor (lb/ton) x Aluminum Throughput (ton/hr)
 PM/PM10/PM2.5 Emissions (ton/yr) = Emissions (lb/hr) x 8760 (hours/hr) / 2000 (lb/ton)
 HF Emissions (lb/hr) = Emission Factor (lb PM / lb flux) x Maximum Usage of Flux (lb flux/hr)
 HF Emissions (ton/yr) = HF Emissions (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)
 SO2, NOx, VOC, CO Emissions are for combustion, and, therefore, are shown in the calculations for Combustion

Individual Furnace PTE Calculation for 326 IAC 1-7 applicability

Melting Furnace	E.F. (lb/ton)	Throughput (lb/hr)	Throughput (tons/hr)	PM PTE		PM10/PM2.5 PTE	
				lbs/hr	tons/yr	lbs/hr	tons/yr
MF-5	1.1	10,000	5.00	5.50	24.09	5.50	24.09
MF-6	1.1	15,000	7.50	8.25	36.14	8.25	36.14
MF-1S	1.1	9,000	4.50	4.95	21.68	4.95	21.68
MF-2M	1.1	9,000	4.50	4.95	21.68	4.95	21.68
MF-3N	1.1	7,000	3.50	3.85	16.86	3.85	16.86
MF-1S	1.1	15,000	7.50	8.25	36.14	8.25	36.14
MF-7	1.1	6,000	3.00	3.30	14.45	3.30	14.45
MF-8A	1.1	1,000	0.50	0.55	2.41	0.55	2.41
Totals			36.00		173.45		173.45

Methodology is same as above table

PM PTE for Melt Furnaces MF-6, MF-1S, MF-9 are each greater than 25 tons/yr, and, therefore, are subject to 326 IAC 1-7.

Appendix A: Emission Calculations

Company Name: Ryobi Die Casting U.S.A., Inc.
 Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
 FESOP Renewal No.: 145-30081-00031
 FESOP AA No.: 145-35824-00031
 Reviewer: C. Sullivan
 Date: 6-Jun-15

Throughput limited to 150,000 ton/yr = 17.12 ton/hr
 = 34,246 lb/hr

Furnace Process Emissions

TYPE OF MATERIAL	Limited Throughput			Capacity million British thermal units per hour/hr	Capacity mmcf/hr	Flux Usage (lb/hr)
	LBS/HR	1 TON/2000 lbs	TON/HR			
Aluminum	34,245	2000	17.12	118.80	0.1188	
	PM	PM10/PM2.5	SOx	NOx	VOC	CO
lb/ton	1.10	1.10	--	--	--	--
lb/mmcf	--	--	0	0	0	0.00
Potential Emissions lbs/hr	18.83	18.83	0.00	0.00	0.00	0.00
Potential Emissions tons/year	82.50	82.50	0.00	0.00	0.00	0.00
						7.73

Source of Emission Factors: STAPPA/ALAPCO Handbook, Volume 1, Section 11.3, Table 11-2. PM and PM10 emission factors include metal throughput .
 The throughput includes the aluminum throughput shown in the Throughput Chart on this page .
 The flux contains HF. HF emission factor is from Material Safety Data Sheets (MSDS) provided by source. HF emissions are not limited, since HF is below 10.0 tons per year.
 Throughput per hour and maximum heat input capacity were provided by the source in its application.

Methodology:

PM/PM10/PM2.5 Emissions (lb/hr) = Emission Factor (lb/ton) x Total Throughput (ton/hr)
 PM/PM10/PM2.5 Emissions (ton/yr) = Emissions (lb/hr) x 8760 (hours/hr) / 2000 (lb/ton)
 HF Emissions (lb/hr) = Emission Factor (lb PM / lb flux) x Maximum Usage of Flux (lb flux/hr)
 HF Emissions (ton/yr) = HF Emissions (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)
 SO2, NOx, VOC, CO Emissions are for combustion, and, therefore, are shown in the calculations for Combustion

Furnace	Throughput (lb/hr)			MMBtu/hr	MMCF/yr
	Metal	Flux	Total		
MF-5	10,000	10.0	10,010	14.4	126.1
MF-6	15,000	15.0	15,015	19.3	169.1
MF-1S	9,000	9.0	9,009	15.0	131.4
MF-2M	9,000	9.0	9,009	23.8	208.5
MF-3N	7,000	7.0	7,007	13.4	117.4
MF-1	15,000	15.0	15,015	18.0	157.7
MF-7	6,000	6.0	6,006	13.4	117.4
MF-8A	1,000	2.5	1,003	1.5	13.1
TOTAL	72,000	73.5	72,074	118.8	1040.7

MMFC/yr = MMBtu/hr x 8760 hr/yr / 1000

**Appendix A: Emission Calculations
Emissions from the Die Casting Process**

**Company Name: Ryobi Die Casting U.S.A., Inc.
Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
FESOP Renewal No.: 145-30081-00031
FESOP AA No.: 145-35824-00031
Reviewer: C. Sullivan
Date: 6-Jun-15**

Max. Al Input
tons/hr

Potential Throughput
MMCF/yr

27.5

	Pollutant					
	PM*	PM10*	SO ₂	NO _x	VOC*	CO
Emission Factor in lbs/ton	-	-	0.02	0.01	0	-
Potential to Emit in tons/yr	0.0	0.0	2.41	1.20	0.0	0.0

Notes: Emission factors for SO₂ and NO_x are from FIRE, Version 6.24, for Aluminum Pouring/Casting (SCC 30400114).

* Emission factor for VOC of 0.14 lb/ton is not applicable for this source because of the nature of this process. The aluminum is piped directly from the furnace bath into the die cast molds in a closed system. Therefore, there are no VOC emissions, due to this source-specific process. IDEM, OAQ, recognizes that there are no particulate emissions from the die casting process.

Methodology

Potential to Emit (tons/yr) = Max. Al Input (tons/hr) x Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Combustion Emissions from Seven (7) Melt Furnaces
Eight (8) Melt Furnaces MF-5, MF-6, MF-1S, MF-2M, MF-3N, MF-1 MF-7, and MF-8A**

**Company Name: Ryobi Die Casting U.S.A., Inc.
Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
FESOP Renewal No.: 145-30081-00031
FESOP AA No.: 145-35824-00031
Reviewer: C. Sullivan
Date: 6-Jun-15**

1. From Natural Gas Combustion (<100 MMBtu/hr):

Total Heat Input MMBtu/hr	Potential throughput MMCF/yr
118.800	1040.69

Emission Factor in lbs/MMCF	Pollutant						
	PM	PM10*	SO ₂	**NO _x	VOC	CO	
	1.9	7.6	0.6	100	5.5	84.0	
Unit ID	Heat Input Capacity (MMBtu/hr)	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)	PTE of SO ₂ (tons/yr)	PTE of NO _x (tons/yr)	PTE of VOC (tons/yr)	PTE of CO (tons/yr)
MF-5	14.4	0.12	0.48	0.04	6.31	0.35	5.30
MF-6	19.3	0.16	0.64	0.05	8.45	0.46	7.10
MF-1S	15.0	0.12	0.50	0.04	6.57	0.36	5.52
MF-2M	23.8	0.20	0.79	0.06	10.4	0.57	8.76
MF-3N	13.4	0.11	0.45	0.04	5.87	0.32	4.93
MF-1	18.0	0.15	0.60	0.05	7.88	0.43	6.62
MF-7	13.4	0.11	0.45	0.04	5.87	0.32	4.93
MF-8A	1.5	0.01	0.05	0.00	0.7	0.04	0.55
Total	118.80	0.99	3.95	0.31	52.03	2.86	43.71

*PM10 emission factor is condensable and filterable PM10 combined.

**Emission factors for NO_x: Uncontrolled = 100 lbs/MMCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3 (AP-42 Supplement D 3/98).

Methodology

PTE (tons/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs

HAPs

Emission Factor in lb/MMcf	HAPs - Organics					Total
	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	1.093E-03	6.244E-04	3.903E-02	9.366E-01	1.769E-03	9.791E-01

Emission Factor in lb/MMcf	HAPs - Metals					Total
	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	2.602E-04	5.724E-04	7.285E-04	1.977E-04	1.093E-03	2.851E-03

Methodology is the same as above.

Total HAPs **9.820E-01**
Worst HAP 9.366E-01

Hexane

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

Company Name: Ryobi Die Casting U.S.A., Inc.

Address: 800 W. Mausoleum Road, Shelbyville, IN 46176

FESOP Renewal No.: 145-30081-00031

FESOP AA No.: 145-35824-00031

Reviewer: C. Sullivan

Date: 6-Jun-15

Plant 1 Insignificant Combustion Units

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
109.77	1000	961.6

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	0.9	3.7	3.7	0.3	48.1	2.6	40.4

*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

Detailed Listing of Combustion Units for this plant are listed in Combustion Units Worksheet

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

Emission Factor in lb/MMcf	HAPs - Organics					Total
	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	1.010E-03	5.770E-04	3.606E-02	8.654E-01	1.635E-03	9.047E-01

Emission Factor in lb/MMcf	HAPs - Metals					Total
	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	2.404E-04	5.289E-04	6.731E-04	1.827E-04	1.010E-03	2.635E-03

Total HAPs 9.074E-01

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**

Company Name: Ryobi Die Casting U.S.A., Inc.
Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
FESOP Renewal No.: 145-30081-00031
FESOP AA No.: 145-35824-00031
Reviewer: C. Sullivan
Date: 6-Jun-15

Plant 2 Insignificant Combustion Units

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
11.304	1000	99.0

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	0.1	0.4	0.4	0.0	5.0	0.3	4.2

*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

Detailed Listing of Combustion Units for this plant are listed in Combustion Units Worksheet

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

Emission Factor in lb/MMcf	HAPs - Organics					Totals
	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	1.040E-04	5.942E-05	3.713E-03	8.912E-02	1.683E-04	9.317E-02

Emission Factor in lb/MMcf	HAPs - Metals					Totals
	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	2.476E-05	5.446E-05	6.932E-05	1.882E-05	1.040E-04	2.713E-04

Total HAPs 9.344E-02

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**

**Company Name: Ryobi Die Casting U.S.A., Inc.
Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
FESOP Renewal No.: 145-30081-00031
FESOP AA No.: 145-35824-00031
Reviewer: C. Sullivan
Date: 6-Jun-15**

Plant 3 Insignificant Combustion Units

Heat Input Capacity MMBtu/hr	HHV <u>mmBtu</u> mmscf	Potential Throughput MMCF/yr
117.121	1000	1026.0

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	1.0	3.9	3.9	0.3	51.3	2.8	43.1

*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

Detailed Listing of Combustion Units for this plant are listed in Combustion Units Worksheet

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

Emission Factor in lb/MMcf	HAPs - Organics					Totals
	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	1.077E-03	6.156E-04	3.847E-02	9.234E-01	1.744E-03	9.653E-01

Emission Factor in lb/MMcf	HAPs - Metals					Totals
	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	2.565E-04	5.643E-04	7.182E-04	1.949E-04	1.077E-03	2.811E-03

Total HAPs 9.681E-01

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**

**Company Name: Ryobi Die Casting U.S.A., Inc.
Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
FESOP Renewal No.: 145-30081-00031
FESOP AA No.: 145-35824-00031
Reviewer: C. Sullivan
Date: 6-Jun-15**

Plant 4 Insignificant Combustion Units

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.501	1000	13.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.01	0.05	0.05	0.00	0.66	0.04	0.55

*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
Detailed Listing of Combustion Units for this plant are listed in Combustion Units Worksheet

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

Emission Factor in lb/MMcf	HAPs - Organics					TOTALS
	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	1.381E-05	7.889E-06	4.931E-04	1.183E-02	2.235E-05	1.237E-02

Emission Factor in lb/MMcf	HAPs - Metals					TOTALS
	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	3.287E-06	7.232E-06	9.204E-06	2.498E-06	1.381E-05	3.603E-05

Total HAPs 1.241E-02

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: Emission Calculations
 Reciprocating Internal Combustion Engines - Natural Gas
 Output Rating (<=600 HP)
 Maximum Input Rate (<=4.2 MMBtu/hr)**

**Company Name: Ryobi Die Casting U.S.A., Inc.
 Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
 FESOP Renewal No.: 145-30081-00031
 FESOP AA No.: 145-35824-00031
 Reviewer: C. Sullivan
 Date: 6-Jun-15**

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity (MMBtu/hr)	0.29
Maximum Hours Operated per Year	500
Potential Throughput (MMBtu/yr)	145

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.0384	0.0384	0.0384	5.88E-04	4.08	0.12	3.72
Potential Emission in tons/yr	0.00	0.00	0.00	0.00	0.30	0.01	0.27

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant							Total PAH HAPs***
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	
Emission Factor in lb/MMBtu	1.94E-03	9.63E-04	2.68E-04	3.91E-05	5.52E-02	8.36E-03	7.78E-03	1.68E-04
Potential Emission in tons/yr	1.41E-04	6.98E-05	1.94E-05	2.83E-06	4.00E-03	6.06E-04	5.64E-04	1.22E-05

Potential Emission of Total HAPs (tons/yr)	5.42E-03
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Methodology

Emission Factors are from AP42 Ch. 3.2

Potential Throughput (MMBtu/yr) = [Heat Input Capacity (MMBtu/hr)] * [500 Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2,000 lb/ton]

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

Company Name: Ryobi Die Casting U.S.A., Inc.
Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
FESOP Renewal No.: 145-30081-00031
FESOP AA No.: 145-35824-00031
Reviewer: C. Sullivan
Date: 6-Jun-15

Sourcewide Natural Gas Usage Limit

Heat Input Capacity MMBtu/hr	HHV mmBtu	Sourcewide Limited Throughput (MMCF/yr)
166.800	mmscf 1000	
		1461.2

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	1.39	5.55	5.55	0.44	73.06	4.02	61.37

*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

Detailed Listing of Combustion Units for this plant are listed in Combustion Units Worksheet

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

Emission Factor in lb/MMcf	HAPs - Organics					TOTALS
	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	1.534E-03	8.767E-04	5.479E-02	1.315E+00	2.484E-03	1.375E+00

Emission Factor in lb/MMcf	HAPs - Metals					TOTALS
	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	3.653E-04	8.036E-04	1.023E-03	2.776E-04	1.534E-03	4.004E-03

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**

**Company Name: Ryobi Die Casting U.S.A., Inc.
Address: 800 W. Mausoleum Road, Shelbyville, IN 46176
FESOP Renewal No.: 145-30081-00031
FESOP AA No.: 145-35824-00031
Reviewer: C. Sullivan
Date: 6-Jun-15**

Furnaces	
<u>Furnace</u>	<u>MMBtu/hr</u>
MF-5	14.40
MF-6	19.30
MF-1S	15.00
MF-2M	23.80
MF-3N	13.40
MF-1S	18.00
MF-7	13.40
MF-8A	1.50
	118.80

Plant 1 Units			
<u>Descript.</u>	<u>MMBtu/hr</u>	<u>No. Units</u>	<u>Total MMBtu/hr</u>
Pre-heat	0.008	3.0	0.024
Makeup Air	1.02	1.0	1.02
Makeup Air	1.972	3.0	5.916
Makeup Air	2.066	1.0	2.066
Makeup Air	2.137	4.0	8.548
Makeup Air	2.1875	11.0	24.0625
Makeup Air	2.324	2.0	4.648
Makeup Air	2.5	1.0	2.5
Makeup Air	2.629	3.0	7.887
Makeup Air	2.817	3.0	8.451
Makeup Air	3.052	2.0	6.104
Makeup Air	3.327	6.0	19.962
Makeup Air	4.1	1.0	4.1
Makeup Air	5.0	1.0	5
Makeup Air	0.0	1.0	0.0092
Space Htr	0.1	51.0	5.1
Door Htrs	0.4	10.0	4
Office Htrs	0.215	1.0	0.215
Office Htrs	0.16	1.0	0.16
	Total PL 1	106.0	109.773

Plant 2 Units			
<u>Descript.</u>	<u>MMBtu/hr</u>	<u>No. Units</u>	<u>Total MMBtu/hr</u>
Makeup Air	0.75	1.0	0.75
Air Curtain	3.5	1.0	3.5
Air Curtain	3.0	1.0	3.0
Air Curtain	2.203	1.0	2.203
Space Htr	0.2	9.0	1.8
Office Htrs	0.0514	1.0	0.0514
	Total PL 2	14.0	11.304

Plant 3 Units			
<u>Descript.</u>	<u>MMBtu/hr</u>	<u>No. Units</u>	<u>Total MMBtu/hr</u>
Pre-heat	2.0	2.0	4.0
Door Htrs	0.4	6.0	2.4
Door Htrs	0.814	8.0	6.512
Makeup Air	0.751	1.0	0.751
Makeup Air	1.503	2.0	3.006
Makeup Air	1.784	6.0	10.704
Makeup Air	1.972	1.0	1.972
Makeup Air	2.536	3.0	7.608
Makeup Air	3.287	4.0	13.148
Makeup Air	3.945	16.0	63.12
Space Htr	0.1	39.0	3.9
	Total PL 3	88.0	117.121

Plant 4 Units			
<u>Descript.</u>	<u>MMBtu/hr</u>	<u>No. Units</u>	<u>Total MMBtu/hr</u>
Unit Htrs	0.216	5.0	1.08
Door Htrs	0.39	1.0	0.39
AC/Htr	0.031	1.0	0.031
	Total PL 4	7.0	1.501



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Brian Smith
Environmental Health & Safety Manager
Ryobi Die Casting U.S.A., Inc.
800 W. Mausoleum Road
Shelbyville, Indiana 46176

DATE: June 30, 2015

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

SUBJECT: Final Decision
FESOP – Administrative Amendment
145-35824-00031

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:
John Chrzanowski, Director of Human Resources
Walter Koucky, Cornerstone Environmental Health & Safety
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	VBIDDLE 6/30/2015 Ryobi Die Casting (USA), Inc. 145-35824-00031 FINAL		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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		Brian Smith Ryobi Die Casting (USA), Inc. 800 W Mausoleum Rd Shelbyville IN 46176 (Source CAATS) VIA CERTIFIED MAIL USPS										
2		John Chrzanowski Director of Human Resources Ryobi Die Casting (USA), Inc. 800 W Mausoleum Rd Shelbyville IN 46176 (RO CAATS)										
3		Mr. Hugh Garner 10203 S Degelow Road Milroy IN 46156 (Affected Party)										
4		Shelbyville City Council and Mayors Office 44 West Washington Shelbyville IN 46176 (Local Official)										
5		Shelby County Commissioners 25 West Polk Shelbyville IN 46176 (Local Official)										
6		Karla Friesen 575 Mountain Avenue Murray Hill NJ 07974 (Affected Party)										
7		Shelby County Health Department 1600 E. SR 44B Shelbyville IN 46176 (Health Department)										
8		Tami Grubbs Shelby County Council 2961 N 100 W Shelbyville In 46176 (Affected Party)										
9		Walter Koucky Cornerstone Environmental 880 Lennox Court Zionsville IN 46077 (Consultant)										
10												
11												
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