



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

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Governor

Thomas W. Easterly
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for Indiana Automotive Fasteners, Inc. in Hancock County

Significant Permit Revision No.: 059-35923-00024

The Indiana Department of Environmental Management (IDEM) has received an application from Indiana Automotive Fasteners, Inc., located at 1300 West Anderson Boulevard, Greenfield, Indiana 46140, for a significant revision of its FESOP issued on September 20, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Indiana Automotive Fasteners, Inc. to make certain changes at its existing source. Indiana Automotive Fasteners, Inc. has applied to add new dip-spin coating line (DS4) and shot blasters (EU-37, EU-59, EU-60, EU-61 and EU-62).

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. The potential to emit of any regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the shot blasters (EU-37, EU-60, EU-61 and EU-62) have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft significant permit revision contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Hancock County Public Library
900 West Mckenzie Road
Greenfield, IN 46140

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number significant permit revision No. 059-35923-00024 in all correspondence.

Comments should be sent to:

Mehul Sura
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-6868
Or dial directly: (317) 233-6868
Fax: (317) 232-6749 attn: Mehul Sura
E-mail: msura@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Mehul Sura or my staff at the above address.


Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality



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Thomas W. Easterly
Commissioner

Gary Berling
Indiana Automotive Fasteners, Inc.
1300 West Anderson Boulevard
Greenfield, Indiana 46140

Re: 059-35923-00024
Significant Revision to 059-31990-00024

Dear Gary Berling:

Indiana Automotive Fasteners, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F059-31990-00024 on September 20, 2012 for a stationary automotive nuts and bolts manufacturing plant located at 1300 West Anderson Boulevard, Greenfield, Indiana 46140. On June 8, 2015, the Office of Air Quality (OAQ) received an application from the source requesting add dip-spin coating line (DS4) and shot blasters (EU-37, EU-59, EU-60, EU-61 and EU-62). The attached Technical Support Document (TSD) provides additional explanation of the changes to the permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

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

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

Attachment A: 40 CFR 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

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 Mehul Sura of my staff at (317) 233-6868 or 1-800-451-6027, and ask for extension 3-6868.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

MNS

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



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Indiana Automotive Fasteners, Inc.
1300 West Anderson Boulevard
Greenfield, Indiana 46140**

(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.: F059-31990-00024	
Issued by: <i>Original Signed by:</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 20, 2012 Expiration Date: September 20, 2022
Minor Permit Revision No.: 059-32958-00024, issued on May 22, 2013 Administrative Amendment No.: 059-34137-00024, issued on February 21, 2014 Administrative Amendment No.: 059-35397-00024, issued on March 3, 2015	
Significant Permit Revision No.: 059-35923-00024	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: September 20, 2022

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Attachment A: NESHAP Subpart 6W - Area Source Standards for Plating and Polishing Operations
[40 CFR 63, Subpart 6W] [326 IAC 20]

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 automotive nuts and bolts manufacturing plant.

Source Address:	1300 West Anderson Boulevard, Greenfield, Indiana 46140
General Source Phone Number:	(317) 467-0100
SIC Code:	3452 (Bolts, Nuts, Screws, Rivets and Washers)
County Location:	Hancock
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 stationary source consists of the following emission units and pollution control devices:

- (a) Fifty-eight (58) head forming machines, four (4) nut forming machines, and eighteen (18) nut tapping machines, collectively identified as EU-6, constructed between 1996 and 2015, each processing a maximum of 12,000 fasteners per hour (each fastener weighs 0.1 oz), each machine is controlled by its corresponding Smog Hog Electrostatic Precipitator, thirty-five (35) of the head forming machines exhausting to stacks V6:1-11 and the remaining machines exhausting within the building.
- (b) Dip-spin Coating Line, identified as DSM, constructed in 1996, modified in 2009 and 2010, for the application of corrosion resistant coatings to ferrous-based metal fasteners, and consisting of:
 - (1) One (1) cleaner wash and natural gas fired dry-off oven (DSM), collectively identified as EU-7, each oven rated at 0.3 MMBtu/hr, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48);
 - (2) Two (2) SBL shot blasters (DSM), identified as EU-8a and EU-8b, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
 - (3) One (1) dacrotizing metal treatment process (DSM), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour and exhausting to stack (V48);
 - (4) One (1) natural gas fired dacrotizing oven, identified as EU-9a, constructed in 1996, rated at 1.0 MMBtu/hr, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48); and
 - (5) One (1) dacrotizing metal treatment process (DSM), identified as EU-9b, dip

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coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack (V48).

- (c) Dip-spin Coating Line 1, identified as DS1, constructed in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48) and consisting of:
 - (1) One (1) dip coating operation (DS1), identified as EU-42, with a maximum throughput of 30,000 parts/fasteners per hour;
 - (2) One (1) natural gas-fired pre-cure oven (DS1), identified as EU-43, constructed in 2011, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr); and
 - (3) One (1) natural gas-fired curing oven, consisting of twelve (12) burners, each rated at 0.15 MMBtu/hr, constructed in 2011, collectively identified as EU-44, with a combined maximum heat input capacity of 1.8 MMBtu/hr.
- (d) Dip-spin Coating Line 2, identified as DS2, constructed in 2002, modified in 2012 for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
 - (1) Two (2) SBL shot blasters (DS2), identified as EU-20a, and EU-20b, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;
 - (2) One (1) cleaner wash and natural gas fired dry-off oven (DS2), identified as EU-21, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V21-A and V21-B;
 - (3) One (1) dip coating operation (DS2), identified as EU-22, processing a maximum of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack (V48);
 - (4) One (1) natural gas fired dry-off oven (DS2), identified as EU-22b, rated at 0.7 MMBtu/hr, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48).
- (e) Dacrotizing Line 3, identified as DS3, constructed in 2009, modified in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
 - (1) Reserved.
 - (2) One (1) dip coating operation (DS3), identified as EU-38, with a maximum throughput of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack (V48);
 - (3) One (1) natural gas fired pre-cure oven (DS3), identified as EU-39, with one (1) burner rated at 0.14 MMBtu/hr, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48).

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- (4) One (1) natural gas fired cure oven (DS3) with a cooling zone, identified as EU-40, with six (6) burners rated at 0.16 MMBtu/hr, each, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48).
- (f) One (1) natural gas-fired thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack (V48).
- (g) One (1) top coating line, identified as (JC-06), consisting of the following:
 - (1) One (1) top coating operation, identified as EU-45, constructed in 2012, with a maximum potential throughput of 20,000 parts per hour, using no controls, and exhausting inside the building;
 - (2) One (1) natural gas-fired pre-cure oven, identified as EU-46, constructed in 2012, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), and exhausting through Stack V45; and
 - (3) One (1) natural gas-fired curing oven, consisting of six (6) burners, each rated at 0.15 MMBtu/hr, constructed in 2012, collectively identified as EU-47, with a combined maximum heat input capacity of 0.90 MMBtu/hr, exhausting through Stacks V-46a and V-46b.
- (h) Barrel Zinc Plating Line 1, identified as BZ1, constructed in 1996, for the application of zinc and chrome coatings to ferrous-based metal fasteners, and consisting of:
 - (1) One (1) electric zinc plating oven, identified as EU-10, uncontrolled, and exhausting to stack V10;
 - (2) One (1) zinc plating/ trivalent chromium treatment dip process, identified as EU-12, coating a maximum of 2,700 pounds of fasteners per hour, or 15 frames per hour, consisting of the following processing tanks, with a packed fume scrubber for control, and exhausting to stack V12;
 - (i) One (1) Alkaline cleaning tank;
 - (ii) One (1) #1 Acid treatment tank;
 - (iii) One (1) #1 Acid Electrolysis tank;
 - (iv) One (1) #2 Acid treatment tank;
 - (v) One (1) Anodic cleaning tank;
 - (vi) One (1) Zinc Plating tank;
 - (vii) One (1) Acid activation tank;
 - (viii) One (1) trivalent Cr (clear) plating tank;
 - (ix) One (1) trivalent Cr (black) plating tank; and
 - (x) One (1) Final (black) plating tank.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing

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Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

- (i) Barrel Zinc Plating Line 2, identified as BZ2, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the following:
 - (1) One (1) electric zinc plating oven, identified as EU-27, constructed in 1996, uncontrolled, and exhausting to stack V27;
 - (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-26, constructed in 2002, coating a maximum of 2,700 pounds of fasteners per hour, or 15 frames per hour, consisting of the following processing tanks, with a packed fume scrubber for control, and exhausting to stack V26;
 - (i) One (1) Alkaline cleaning tank;
 - (ii) One (1) #1 Acid treatment tank;
 - (iii) One (1) #1 Acid Electrolysis tank;
 - (iv) One (1) #2 Acid treatment tank;
 - (v) One (1) Anodic cleaning tank;
 - (vi) One (1) Zinc Plating tank;
 - (vii) One (1) Acid activation tank;
 - (viii) One (1) trivalent Cr (clear) plating tank;
 - (ix) One (1) trivalent Cr (black) plating tank; and
 - (x) One (1) Final (black) plating tank.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

- (j) Barrel Zinc plating Line 3, identified as BZ3, constructed in 2009, for the application of zinc and chrome coatings to ferrous based metal fasteners, and including the following:
 - (1) One (1) alkaline zinc plating and trivalent chromium treatment dip process, identified as EU-41, (no VOC's) coating a maximum of 3000 pounds of fasteners per hour, or 15 frames per hour, consisting of the following processing tanks, with a packed fume scrubber for control, and exhausting to stack V41.
 - (i) One (1) Alkaline cleaning tank;
 - (ii) One (1) #1 Acid treatment tank;
 - (iii) One (1) #1 Acid Electrolysis tank;
 - (iv) One (1) #2 Acid treatment tank;

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- (v) One (1) Anodic cleaning tank;
- (vi) One (1) Zinc Plating tank;
- (vii) One (1) Acid activation tank;
- (viii) One (1) trivalent Cr (clear) plating tank;
- (ix) One (1) trivalent Cr (black) plating tank; and
- (x) One (1) Final (black) plating tank.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

- (k) Barrel Zinc Plating Line 4, identified as BZ4, constructed in 2013, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the following:

- (1) One (1) electric zinc plating oven, identified as EU-49, uncontrolled, and exhausting to stack V48;
- (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-50, coating a maximum of 2,700 pounds of fasteners per hour or 15 frames per hour, consisting of the following processing tanks and using a packed fume scrubber for control, and exhausting to stack V49:

- (xi) One (1) Alkaline cleaning tank;
- (xii) One (1) #1 Acid treatment tank;
- (xiii) One (1) #1 Acid Electrolysis tank;
- (xiv) One (1) #2 Acid treatment tank;
- (xv) One (1) Anodic cleaning tank;
- (xvi) One (1) Zinc Plating tank;
- (xvii) One (1) Acid activation tank;
- (xviii) One (1) trivalent Cr (clear) plating tank;
- (xix) One (1) trivalent Cr (black) plating tank; and
- (xx) One (1) Final (black) plating tank.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

- (l) Barrel Zinc Plating Line 5, identified as BZ5, approved in 2015 for construction, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the

following:

- (1) One (1) electric zinc plating oven, identified as EU-53, uncontrolled, and exhausting to stack V62;
- (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-54, coating a maximum of 2,700 pounds of fasteners per hour, or 15 frames per hour, consisting of the following processing tanks and using a packed fume scrubber for control, and exhausting to stack V63:
 - (i) One (1) Alkaline cleaning tank;
 - (ii) One (1) #1 Acid treatment tank;
 - (iii) One (1) #1 Acid Electrolysis tank;
 - (iv) One (1) #2 Acid treatment tank;
 - (v) One (1) Anodic cleaning tank;
 - (vi) One (1) Zinc Plating tank;
 - (vii) One (1) Acid activation tank;
 - (viii) One (1) trivalent Cr (clear) plating tank;
 - (ix) One (1) trivalent Cr (black) plating tank; and
 - (x) One (1) Final (black) plating tank.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

- (m) One (1) Oil Quench Line (LOQ2), identified as EU-51, constructed in 2013, for the heat treatment of metal fasteners, with maximum capacity of 1,100 pounds per hour, uncontrolled, consisting of:
 - (i) One (1) pre wash/drying unit, exhausting to stacks V51;
 - (ii) One (1) electric drying oven, exhausting to stacks V52A, V52B, and V52C;
 - (iii) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr, exhausting to stacks V54A and V54B;
 - (iv) One (1) post wash/drying unit, exhausting to stacks V55A, V55B and V55C;
 - (v) One (1) electric drying oven, exhausting to stacks V56A, and V56B;
 - (vi) One (1) electric tempering furnace, V57A, V57B and V57C;
 - (vii) Two (2) oil tanks;

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- (viii) Two (2) cooling chambers, exhausting to stacks V58; and
- (ix) One (1) CO₂ Generator, using natural gas at the rate of 0.078 MMBtu/hr., exhausting to stacks V50.
- (n) One (1) dip-spin coating line, identified as DS4, for metal fasteners coating, approved in 2015 for construction, with a maximum capacity of 30,000 fasteners per hour, controlled by a thermal oxidizer (EU-48), exhausting to stack (V48), and consisting of :
 - (i) One (1) dip coating operation, identified as EU-56,
 - (i) One (1) natural gas-fired pre-cure oven, identified as EU-57, with one (1) burner rated at 0.20 MMBtu/hour, and
 - (ii) One (1) natural gas-fired pre-cure oven, identified as EU-58, with 10 burners, each rated at 0.16 MMBtu/hour.
- (o) One (1) SBL shot blaster, identified as EU-37, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-37) and exhausting inside.
- (p) One (1) SBL shot blaster, identified as EU-59, approved in 2015 for construction, with a with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-59) and exhausting inside.
- (q) One (1) SBL shot blaster, identified as EU-60, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-60) and exhausting inside.
- (r) One (1) SBL shot blaster, identified as EU-61, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-61) and exhausting inside.
- (s) One (1) SBL shot blaster, identified as EU-62, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-62) and exhausting inside.

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) One (1) electric annealing oven (LAN), identified as EU-1, processing a maximum of 1,100 pounds of fasteners per hour, constructed in 1996, uncontrolled, and exhausting to stacks V1-A and V1-B;
- (b) One (1) electric bluing oven (AOQ) identified as EU-2, processing a maximum of 1,100 pounds of fasteners per hour, constructed in 1996, uncontrolled, and exhausting to stacks V2-A and V2-B;
- (c) Oil Quench Line 1 (OQ1), identified EU-3, constructed 1996, for the heat treatment of metal fasteners at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V24, V3, V4 & V5 and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at

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0.01MMBtu/hr;

- (3) One (1) electric tempering furnace.
- (d) Six (6) natural gas fired boilers consisting of:
 - (1) EU-15, constructed in 1996, rated at 2.1 MMBtu/hr and exhausting to stacks V15; [326 IAC 6-2-4]
 - (2) EU-15-1, constructed in 1996, rated at 1.977 MMBtu/hr and exhausting to stacks V15-1; [326 IAC 6-2-4]
 - (3) EU-15-2, constructed in 2012, rated at 1.977 MMBtu/hr, and exhausting to stack V15-2; [326 IAC 6-2-4]
 - (4) EU-15-3, constructed in 2013, rated at 1.977 MMBtu/hr, and exhausting to stack V15-3; [326 IAC 6-2-4]
 - (5) EU-16, constructed in 1996, rated at 1.2 MMBtu/hr and exhausting to stack V16; [326 IAC 6-2-4]
 - (6) EU-15-4, approved in 2015 for construction, rated at 1.977 MMBtu/hr, and exhausting to stack V15-4
- (e) Two (2) 7,000 gallon hydrochloric acid (HCL) storage tanks, identified as EU-18, constructed in 2007, controlled by the BZ2 scrubber, and exhausting to stack V26;
- (f) One (1) top coating line, identified as JC-03 using dip coating to apply VOC and HAP free coatings to metal fasteners, and consisting of:
 - (1) One (1) dip coating operation and natural gas fired dry-off oven, identified as EU-23, rated at 0.16 MMBtu/hr, processing a maximum of 700 pounds of fasteners per hour, uncontrolled, and exhausting to stacks V23-A and V23-B.
- (g) Oil Quench Line 2 (OQ2), identified EU-25, constructed in 2002, for the heat treatment of metal fasteners, at a rate of 7,000lb/hr, uncontrolled, exhausting to stacks V24, V25-A, V25-B, V25-C & V25-D, and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
 - (3) One (1) natural gas fired tempering furnace, rated at 0.16 MMBtu/hr.
- (h) Oil Quench Line 3 (OQ3), identified EU-29, for the heat treatment of metal fasteners, at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V28, V29-A, V29-B & V29-C, and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
 - (3) One (1) natural gas fired tempering furnace, rated at 0.16MMBtu/hr.

- (i) Oil Quench Line 4 (OQ4), identified EU-31, for the heat treatment of metal fasteners at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V28, V31-A, V31-B & V31-C, and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
 - (3) One (1) natural gas fired tempering furnace rated at 0.16MMBtu/hr.
- (j) Oil Quench Line 5 (OQ5), identified EU-33, for the heat treatment of metal fasteners, at a rate of 7000 lbs of fasteners/hr, uncontrolled, exhausting to stacks V32, V33-A, V33-B & V33-C, and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
 - (3) One (1) natural gas fired tempering furnace, rated at 0.16 MMBtu/hr.
- (k) Lubricating Oil Quench Line (LOQ1), identified as EU-34, for the heat treatment of metal fasteners, at a rate of 4800 per hour, uncontrolled, exhausting to stacks V34-A through V34-K, and consisting of:
 - (1) one (1) pre wash/dry unit,
 - (2) two (2) gas generators,
 - (3) four (4) natural gas-fired quenching furnaces, each rated at 0.34 MMBtu/hr,
 - (4) four (4) oil quenches,
 - (5) one (1) post wash/dry unit,
 - (6) two (2) natural gas-fired tempering furnaces, each rated at 0.18 MMBtu/hr;
 - (7) four (4) electric tempering furnaces; and
 - (8) six (6) cooling chambers.
- (l) Oil Quench Line 6 (OQ6), identified EU-35, for the heat treatment of metal fasteners, at a rate of 7,000 lb/hr, uncontrolled, exhausting to stacks V32, V35-A, V35-B & V35-C, and consisting of:
 - (1) One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr;
 - (2) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01MMBtu/hr;
 - (3) One (1) natural gas fired tempering furnace, rated at 0.16 MMBtu/hr.
- (m) One (1) Oil Quench Line (OQ7), identified as EU-55, approved in 2015 for construction, for the heat treatment of metal fasteners, with maximum capacity of 7,000 pounds per hour, uncontrolled, exhausting to stacks V64, V65-A and V65-B and V65-C; consisting of:
 - (i) One (1) electric oil quench furnace with a natural gas flame curtain, rated at 0.01 MMBtu/hr;
 - (ii) One (1) natural gas tempering furnace rated at 0.16 MMBtu/hr;

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- (iii) One (1) quench tank, One (1) CO₂ Generator, using natural gas at the rate of 0.78 MMBtu/hr.
- (n) Two (2) electric annealing batch ovens (LAN), identified as EU-36a & EU-36b, constructed in 2007, uncontrolled, and exhausting to stacks V36-a & V36-b. Each unit has a maximum processing capacity of 3100 pounds of fasteners per day.
- (o) One (1) natural gas fired annealing oven (LAN #1), identified as EU-52, constructed in 2014, with a maximum capacity of 2200 pounds of fasteners per hour, consisting of three (3) bake zones, each with two (2) burners rated at 0.1586 MMBtu/hr each, equipped with a natural gas fired smoke eater, rated at 0.1586 MMBtu/hr, uncontrolled, and exhausting to stacks V59, V60, and V61.

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).

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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, F059-31990-00024, 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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).

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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) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

The 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.

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

B.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

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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.

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- (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 F059-31990-00024 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.

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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(42). 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

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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

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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;

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- (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 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.

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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, 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.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) 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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.9 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.10 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.11 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.12 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

- (a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

- (b) For existing units:

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 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 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).

C.13 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.14 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.15 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.16 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.17 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.18 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 includes 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 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.19 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

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

Stratospheric Ozone Protection

C.20 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.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Head forming machines

- (a) Fifty-eight (58) head forming machines, four (4) nut forming machines, and eighteen (18) nut tapping machines, collectively identified as EU-6, constructed between 1996 and 2015, each processing a maximum of 12,000 fasteners per hour (each fastener weighs 0.1 oz), each machine is controlled by its corresponding Smog Hog Electrostatic Precipitator, thirty-five (35) of the head forming machines exhausting to stacks V6:1-11 and the remaining machines exhausting within the building.

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

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

D.1.1 FESOP Limits: PM₁₀, PM_{2.5} [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

- (a) The PM₁₀ emissions from the 58 head forming machines, 4 nut forming machines and 18 nut tapping machines of EU-6 shall not exceed 0.241 pounds per hour, each.
- (b) The PM_{2.5} emissions from the 58 head forming machines, 4 nut forming machines and 18 nut tapping machines of EU-6 shall not exceed 0.241 pounds per hour, each.

Compliance with the above PM₁₀ and PM_{2.5} limits, in conjunction with the Condition D.2.1 and potential to emit PM₁₀ and PM_{2.5} from all other emission units at this source, shall limit the source-wide total potential to emit of PM₁₀ and PM_{2.5}, to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 PSD Minor Limit: PM [326 IAC 2-2]

In order to render 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

- (a) The PM emissions from the 58 head forming machines, 4 nut forming machines and 18 nut tapping machines of EU-6 shall not exceed 0.241 pounds per hour, each.

Compliance with the above PM limit, in conjunction with the Condition D.2.2 and 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, each, and shall render 326 IAC 2-2 (PSD), not applicable.

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

A Preventive Maintenance Plan is required for these facilities and any corresponding 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 and to assure that each machine of EU-6 is exempted from 326 IAC 6-3, the electrostatic precipitators for particulate control shall be in operation and control emissions from each of the head and nut forming machines and nut tapping machines at all times that any of the head and nut forming machines and nut tapping machines is

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in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]

D.1.5 Visible Emissions Notations

- (a) Visible emissions notations of the thirty-five (35) head forming machines exhausting to stacks V6:1-11 shall be performed once per day during normal daylight operations. 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 steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the thirty-five (35) head forming machines exhausting to stacks V6:1-11. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Dacrotizing Coating

- (b) Dip-spin Coating Line, identified as DSM, constructed in 1996, modified in 2009 and 2010, for the application of corrosion resistant coatings to ferrous-based metal fasteners, and consisting of:
- (1) One (1) cleaner wash and natural gas fired dry-off oven (DSM), collectively identified as EU-7, each oven rated at 0.3 MMBtu/hr, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48);
 - (2) Two (2) SBL shot blasters (DSM), identified as EU-8a and EU-8b, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
 - (3) One (1) dacrotizing metal treatment process (DSM), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour and exhausting to stack (V48);
 - (4) One (1) natural gas fired dacrotizing oven, identified as EU-9a, constructed in 1996, rated at 1.0 MMBtu/hr, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48); and
 - (5) One (1) dacrotizing metal treatment process (DSM), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack (V48).
- (c) Dip-spin Coating Line 1, identified as DS1, constructed in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48) and consisting of:
- (1) One (1) dip coating operation (DS1), identified as EU-42, with a maximum throughput of 30,000 parts/fasteners per hour;
 - (2) One (1) natural gas-fired pre-cure oven (DS1), identified as EU-43, constructed in 2011, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr); and
 - (3) One (1) natural gas-fired curing oven, consisting of twelve (12) burners, each rated at 0.15 MMBtu/hr, constructed in 2011, collectively identified as EU-44, with a combined maximum heat input capacity of 1.8 MMBtu/hr.
- (d) Dip-spin Coating Line 2, identified as DS2, constructed in 2002, modified in 2012 for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
- (1) Two (2) SBL shot blasters (DS2), identified as EU-20a, and EU-20b, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;
 - (2) One (1) cleaner wash and natural gas fired dry-off oven (DS2), identified as EU-21, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V21-A and V21-

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B;

- (3) One (1) dip coating operation (DS2), identified as EU-22, processing a maximum of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack (V48);
- (4) One (1) natural gas fired dry-off oven (DS2), identified as EU-22b, rated at 0.7 MMBtu/hr, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48).
- (e) Dacrotizing Line 3, identified as DS3, constructed in 2009, modified in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
 - (1) Reserved.
 - (2) One (1) dip coating operation (DS3), identified as EU-38, with a maximum throughput of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack (V48);
 - (3) One (1) natural gas fired pre-cure oven (DS3), identified as EU-39, with one (1) burner rated at 0.14 MMBtu/hr, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48).
 - (4) One (1) natural gas fired cure oven (DS3) with a cooling zone, identified as EU-40, with six (6) burners rated at 0.16 MMBtu/hr, each, controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48).
- (f) One (1) natural gas-fired thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack (V48).
- (g) One (1) top coating line, identified as (JC-06), consisting of the following:
 - (1) One (1) top coating operation, identified as EU-45, constructed in 2012, with a maximum potential throughput of 20,000 parts per hour, using no controls, and exhausting inside the building;
 - (2) One (1) natural gas-fired pre-cure oven, identified as EU-46, constructed in 2012, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), and exhausting through Stack V45; and
 - (3) One (1) natural gas-fired curing oven, consisting of six (6) burners, each rated at 0.15 MMBtu/hr, constructed in 2012, collectively identified as EU-47, with a combined maximum heat input capacity of 0.90 MMBth/hr, exhausting through Stacks V-46a and V-46b.
- (n) One (1) dip-spin coating line, identified as DS4, for metal fasteners coating, approved in 2015 for construction, with a maximum capacity of 30,000 fasteners per hour, controlled by a thermal oxidizer (EU-48), exhausting to stack (V48), and consisting of :
 - (i) One (1) dip coating operation, identified as EU-56,
 - (i) One (1) natural gas-fired pre-cure oven, identified as EU-57, with one (1) burner rated at 0.20 MMBtu/hour, and
 - (ii) One (1) natural gas-fired pre-cure oven, identified as EU-58, with 10 burners, each rated at 0.16 MMBtu/hour.

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- (o) One (1) SBL shot blaster, identified as EU-37, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-37) and exhausting inside.
- (p) One (1) SBL shot blaster, identified as EU-59, approved in 2015 for construction, with a with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-59) and exhausting inside.
- (q) One (1) SBL shot blaster, identified as EU-60, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-60) and exhausting inside.
- (r) One (1) SBL shot blaster, identified as EU-61, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-61) and exhausting inside.
- (s) One (1) SBL shot blaster, identified as EU-62, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-62) and exhausting inside.

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

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

D.2.1 FESOP Limits: PM10 and PM2.5 [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

Shotblaster ID	PM10 (lbs/hr)*	PM2.5 (lbs/hr)*	control
SBL shot blaster (EU-8a)	0.35	0.35	Baghouse/V8
SBL shot blaster (EU-8b)	(total)	(total)	
SBL shot blaster (EU-20a)	0.24	0.24	Baghouse/V20
SBL shot blaster (EU-20b)	(total)	(total)	
SBL shot blaster (EU-37)	0.09	0.09	baghouse (BH-37)
SBL shot blaster (EU-59)	0.09	0.09	baghouse (BH-59)
SBL shot blaster (EU-60)	0.09	0.09	baghouse (BH-60)
SBL shot blaster (EU-61)	0.09	0.09	baghouse (BH-61)
SBL shot blaster (EU-62)	0.09	0.09	baghouse (BH-62)

* Limits are after control.

Compliance with the above PM10 and PM2.5 limits, in conjunction with the Condition D.1.1 and potential to emit PM₁₀ and PM_{2.5} from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM_{2.5}, to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

D.2.2 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

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Shotblaster ID	Control/Stack	PM Limit (lbs/hr)
SBL shot blaster (EU-8a)	Baghouse/V8	7.44
SBL shot blaster (EU-8b)	Baghouse/V8	7.44
SBL shot blaster (EU-20a)	Baghouse/V20	7.44
SBL shot blaster (EU-20b)	Baghouse/V20	7.44
SBL shot blaster (EU-37)	baghouse (BH-37)	0.87
SBL shot blaster (EU-59)	baghouse (BH-59)	0.87
SBL shot blaster (EU-60)	baghouse (BH-60)	0.87
SBL shot blaster (EU-61)	baghouse (BH-61)	0.87
SBL shot blaster (EU-62)	baghouse (BH-62)	0.87

Compliance with these limits, in conjunction with the Condition D.1.2 and 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 two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [326 IAC 2(b)]

(a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water from each of these emission units: DSM EU-9, DSM EU9b, DS2 EU-22, DS3 EU-38, DS1 EU-42 and DS4, as delivered to the applicator.

(b) When using non-compliant coatings, the Permittee shall comply with the following:

- (1) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from emissions units DSM EU-9, DSM EU9b, DS2 EU-22, DS3 EU-39, DS1 EU-42 and DS4 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where:

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;

D= Density of VOC in coating in pounds per gallon of VOC;

E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (2) The pounds of VOC per gallon of coating solids shall be limited to less 6.67.
- (3) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the non-compliant coating or, if multiple non-compliant coatings are used, the daily weighted average VOC content of all non-compliant coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 68.3%.

D.2.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), when using solvents for clean-up at emission units EU-9, EU9b, EU-22, EU-38, EU-42 and DS4, work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.2.5 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Shotblaster ID	Control/Stack	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
SBL shot blaster (EU-8a)	Baghouse/V8	0.83	3.62
SBL shot blaster (EU-8b)	Baghouse/V8	0.83	3.62
SBL shot blaster (EU-20a)	Baghouse/V20	0.47	2.47
SBL shot blaster (EU-20b)	Baghouse/V20	0.47	2.47

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Shotblaster ID	Control/Stack	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
SBL shot blaster (EU-37)	Baghouse (BH-37)	0.17	1.26
SBL shot blaster (EU-59)	Baghouse (BH-59)	0.17	1.26
SBL shot blaster (EU-60)	Baghouse (BH-60)	0.17	1.26
SBL shot blaster (EU-61)	Baghouse (BH-61)	0.17	1.26
SBL shot blaster (EU-62)	Baghouse (BH-62)	0.17	1.26

The pound per hour limitation was calculated with 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:

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

D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any corresponding 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.2.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and to comply with Condition D.2.3, the Permittee shall operate the thermal oxidizer (EU-48) at all times.

D.2.9 Particulate Control

- (a) In order to comply with Conditions D.2.1, D.2.2 and D.2.5, the baghouses and cartridge filter for particulate control shall be in operation and control emissions from the shotblasters EU-8a, EU-8b, EU-20a, EU-20b, EU-37, EU-59, EU-60, EU-61 and EU-62 are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.2.3, the Permittee shall perform VOC testing of the thermal oxidizer (EU-48), utilizing methods as approved by the Commissioner no later than five (5) years after the most recent testing. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]

D.2.11 Visible Emissions Notations

- (a) Visible emissions notations of the shot blasters stack exhausts (V8 and V20) shall be performed once per day during normal daylight operations. 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 steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.2.12 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour rolling average. From the date of startup until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour rolling average temperature of at least 1,400 degrees Fahrenheit.
- (b) The Permittee shall determine the 3-hour rolling average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.2, as approved by IDEM.
- (c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour rolling average temperature as observed during the compliance stack test.

D.2.13 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across each of the baghouses used in conjunction with each of the shotblasters (EU-8a, EU-8b, EU-20a, EU-20b, EU-37, EU-59, EU-60, EU-61 and EU-62), at least once per day when any of the shotblasters are in operation. When for any one reading, the pressure drop across each of the baghouses is outside the normal range, the Permittee shall take reasonable response steps. The normal range for this unit is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit. A pressure reading that is outside the above mentioned range is not a deviation from this

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- (b) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits established in the permit.
- (c) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

The instrument(s) 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.2.14 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]

D.2.15 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.2.3.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis:
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The total VOC usage for each month.
 - (4) The monthly cleanup solvent usage.

- (b) To document the compliance status with Condition D.2.11, the Permittee shall maintain a daily record of visible emission notations of the shotblasters stack exhausts (V8 and V20). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.2.12, the Permittee shall maintain continuous temperature records (on a 3-hour rolling average basis) for the thermal oxidizer and the 3-hour rolling average temperature used to demonstrate compliance during the most recent compliant stack test.
- (d) To document the compliance status with Condition D.2.13(a), the Permittee shall maintain a daily record of the pressure drop across the baghouses controlling the shotblasters. 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).
- (e) To document the compliance status with Conditions D.2.13(b) and (c), the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizer. The Permittee shall include in its daily record when the duct pressure or fan amperage is not taken and the reason for the lack of the reading (e.g. the process did not operate that day).
- (f) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Boilers

- (d) Six (6) natural gas fired boilers consisting of:
- (1) EU-15, constructed in 1996, rated at 2.1 MMBtu/hr and exhausting to stacks V15; [326 IAC 6-2-4]
 - (2) EU-15-1, constructed in 1996, rated at 1.977 MMBtu/hr and exhausting to stacks V15-1; [326 IAC 6-2-4]
 - (3) EU-15-2, constructed in 2012, rated at 1.977 MMBtu/hr, and exhausting to stack V15-2; [326 IAC 6-2-4]
 - (4) EU-15-3, constructed in 2013, rated at 1.977 MMBtu/hr, and exhausting to stack V15-3; [326 IAC 6-2-4]
 - (5) EU-16, constructed in 1996, rated at 1.2 MMBtu/hr, and exhausting to stack V16; [326 IAC 6-2-4]
 - (6) EU-15-4, approved in 2015 for construction, rated at 1.977 MMBtu/hr, and exhausting to stack V15-4

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

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

D.3.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating):

- (1) the PM emissions from five (5) natural gas-fired boilers (EU-15, EU-15-1, 15-2, EU-15-3 and EU-16), rated at 2.1, 1.977, 1.977, 1.2 and 1.977 MMBtu/hr, respectively, shall not exceed 0.56 pounds per MMBtu heat input.
- (2) the PM emissions from the natural gas-fired boiler (EU-15-4), rated at 1.977 MMBtu/hr, shall not exceed 0.54 pounds per MMBtu heat input.

Pursuant to this rule, PM emissions from the boilers shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = pounds of particulate matter emitted per million Btu of heat input
Q = total source maximum operating capacity rating in million Btu per hour heat input MMBtu/hr

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SECTION E.1

FACILITY OPERATION CONDITIONS

Emissions Unit Description: Plating and Polishing Operations

- (h) Barrel Zinc Plating Line 1, identified as BZ1, constructed in 1996, for the application of zinc and chrome coatings to ferrous-based metal fasteners, and consisting of:
 - (1) One (1) electric zinc plating oven, identified as EU-10, uncontrolled, and exhausting to stack V10;
 - (2) One (1) zinc plating/ trivalent chromium treatment dip process, identified as EU-12, coating a maximum of 2,700 pounds of fasteners per hour, or 15 frames per hour, consisting of the following processing tanks, with a packed fume scrubber for control, and exhausting to stack V12;
 - (i) One (1) Alkaline cleaning tank;
 - (ii) One (1) #1 Acid treatment tank;
 - (iii) One (1) #1 Acid Electrolysis tank;
 - (iv) One (1) #2 Acid treatment tank;
 - (v) One (1) Anodic cleaning tank;
 - (vi) One (1) Zinc Plating tank;
 - (vii) One (1) Acid activation tank;
 - (viii) One (1) trivalent Cr (clear) plating tank;
 - (ix) One (1) trivalent Cr (black) plating tank; and
 - (x) One (1) Final (black) plating tank.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.
- (i) Barrel Zinc Plating Line 2, identified as BZ2, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the following:
 - (1) One (1) electric zinc plating oven, identified as EU-27, constructed in 1996, uncontrolled, and exhausting to stack V27;
 - (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-26, constructed in 2002, coating a maximum of 2,700 pounds of fasteners per hour, or 15 frames per hour, consisting of the following processing tanks, with a packed fume scrubber for control, and exhausting to stack V26;
 - (i) One (1) Alkaline cleaning tank;
 - (ii) One (1) #1 Acid treatment tank;

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- (iii) One (1) #1 Acid Electrolysis tank;
- (iv) One (1) #2 Acid treatment tank;
- (v) One (1) Anodic cleaning tank;
- (vi) One (1) Zinc Plating tank;
- (vii) One (1) Acid activation tank;
- (viii) One (1) trivalent Cr (clear) plating tank;
- (ix) One (1) trivalent Cr (black) plating tank; and
- (x) One (1) Final (black) plating tank.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

- (j) Barrel Zinc plating Line 3, identified as BZ3, constructed in 2009, for the application of zinc and chrome coatings to ferrous based metal fasteners, and including the following:

- (1) One (1) alkaline zinc plating and trivalent chromium treatment dip process, identified as EU-41, (no VOC's) coating a maximum of 3000 pounds of fasteners per hour, or 15 frames per hour, consisting of the following processing tanks, with a packed fume scrubber for control, and exhausting to stack V41.

- (i) One (1) Alkaline cleaning tank;
- (ii) One (1) #1 Acid treatment tank;
- (iii) One (1) #1 Acid Electrolysis tank;
- (iv) One (1) #2 Acid treatment tank;
- (v) One (1) Anodic cleaning tank;
- (vi) One (1) Zinc Plating tank;
- (vii) One (1) Acid activation tank;
- (viii) One (1) trivalent Cr (clear) plating tank;
- (ix) One (1) trivalent Cr (black) plating tank; and
- (x) One (1) Final (black) plating tank.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of

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the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

- (k) Barrel Zinc Plating Line 4, identified as BZ4, constructed in 2013, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the following:

- (1) One (1) electric zinc plating oven, identified as EU-49, uncontrolled, and exhausting to stack V48;
- (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-50, coating a maximum of 2,700 pounds of fasteners per hour or 15 frames per hour, consisting of the following processing tanks and using a packed fume scrubber for control, and exhausting to stack V49:
 - (i) One (1) Alkaline cleaning tank;
 - (ii) One (1) #1 Acid treatment tank;
 - (iii) One (1) #1 Acid Electrolysis tank;
 - (iv) One (1) #2 Acid treatment tank;
 - (v) One (1) Anodic cleaning tank;
 - (vi) One (1) Zinc Plating tank;
 - (vii) One (1) Acid activation tank;
 - (viii) One (1) trivalent Cr (clear) plating tank;
 - (ix) One (1) trivalent Cr (black) plating tank; and
 - (x) One (1) Final (black) plating tank.

Under 40 CFR 63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

- (l) Barrel Zinc Plating Line 5, identified as BZ5, approved in 2015 for construction, for the application of zinc and chrome coatings to ferrous based metal fasteners, including the following:

- (1) One (1) electric zinc plating oven, identified as EU-53, uncontrolled, and exhausting to stack V62;
- (2) One (1) zinc plating and trivalent chromium treatment dip process, identified as EU-54, coating a maximum of 2,700 pounds of fasteners per hour, or 15 frames per hour, consisting of the following processing tanks and using a packed fume scrubber for control, and exhausting to stack V63:
 - (i) One (1) Alkaline cleaning tank;
 - (ii) One (1) #1 Acid treatment tank;

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- (iii) One (1) #1 Acid Electrolysis tank;
- (iv) One (1) #2 Acid treatment tank;
- (v) One (1) Anodic cleaning tank;
- (vi) One (1) Zinc Plating tank;
- (vii) One (1) Acid activation tank;
- (viii) One (1) trivalent Cr (clear) plating tank;
- (ix) One (1) trivalent Cr (black) plating tank; and
- (x) One (1) Final (black) plating tank.

Under 40 CFR 63, Subpart WWWWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, each of the zinc plating tanks and the trivalent chromate dip tanks are considered an affected facility.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [40 CFR 63]

E.1.1 General Provisions Relating to NESHAP Subpart WWWWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.460(b), the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, Appendix C of 40 CFR Part 63, Subpart WWWWWW in accordance with the schedule in 40 CFR 63 Subpart WWWWWW.

E.1.2 NESHAP Subpart WWWWWW Requirements [40 CFR Part 63, Subpart WWWWWW]

The Permittee which operates a stationary plating and polishing source shall comply with the following provisions of 40 CFR Part 63, Subpart WWWWWW (included as Attachment A of this permit):

- (a) § 63.11504(a)(1)(iii), (a)(2), (a)(3);
- (b) § 63.11505(a)(1), (b), (e);
- (c) § 63.11506(a);
- (d) § 63.11507(g);
- (e) § 63.11508(a), (b), (d)(1), (d)(2), (d)(8)
- (f) § 63.11509(a), (b), (c)(6), (c)(7), (d), (e), (f)
- (g) § 63.11510
- (h) § 63.11511
- (i) § 63.11512

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Indiana Automotive Fasteners, Inc.
Source Address: 1300 West Anderson Boulevard, Greenfield, Indiana 46140
FESOP Permit No.: F059-31990-00024

**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:

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**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: Indiana Automotive Fasteners, Inc.
Source Address: 1300 West Anderson Boulevard, Greenfield, Indiana 46140
FESOP Permit No.: F059-31990-00024

This form consists of 2 pages

Page 1 of 2

- ☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- 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: _____

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**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: Indiana Automotive Fasteners, Inc.
Source Address: 1300 West Anderson Boulevard, Greenfield, Indiana 46140
FESOP Permit No.: F059-31990-00024

Months: _____ to _____ Year: _____

Page 1 of 2

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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ 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 a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Description and Location

Source Name:	Indiana Automotive Fasteners, Inc.
Source Location:	1300 West Anderson Boulevard, Greenfield, Indiana 46140
County:	Hancock
SIC Code:	3452 (Bolts, Nuts, Screws, Rivets and Washers)
Operation Permit No.:	059-31990-00024
Operation Permit Issuance Date:	September 20, 2012
Significant Permit Revision No.:	059-35923-00024
Permit Reviewer:	Mehul Sura

On June 8, 2015, the Office of Air Quality (OAQ) received an application from Indiana Automotive Fasteners, Inc. related to a modification to an existing stationary automotive nuts and bolts manufacturing plant.

Existing Approvals

The source was issued FESOP Renewal No. F059-31990-00024 on September 20, 2012. The source has since received the following approvals:

Permit Number	Issuance Date
Minor permit revision No. 059-32958-00024	May 22, 2013
Administrative Amendment No. 059-34137-00024	February 21, 2014
Administrative Amendment No. 059-35397-00024	March 3, 2015

County Attainment Status

The source is located in Hancock 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. Hancock County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD or Appendix A of 059-35397-00024, issued on March 3, 2015.

Process/ Emission Unit	Potential To Emit of the Entire Source After this FESOP Administrative Amendment (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Head Forming & Nut Forming Machines (EU-6) ¹	106.20	74.95	74.95	-	-	9.81	-	1.37	1.16 - Manganese
Abrasive Blasting (EU-8a) ²	32.6	6.15	6.15	-	-	-	-	0.485	0.358 - Manganese
Abrasive Blasting (EU-8b) ²	32.6	6.15	6.15	-	-	-	-	0.485	0.358 - Manganese
Abrasive Blasting (EU-20a) ²	32.6	3.52	3.52	-	-	-	-	0.485	0.358 - Manganese
Abrasive Blasting (EU-20b) ²	32.6	3.52	3.52	-	-	-	-	0.485	0.358 - Manganese
DSM Line (EU-9)	0.31	0.31	0.31	-	-	11.47	-	1.08	0.56 - Xylene
DSM Line (EU-9b)	0.19	0.19	0.19	-	-	10.85	-	0.20	0.20- Xylene
DS1 Line (EU-42)	-	-	-	-	-	8.76	-	1.66	1.66 - Methanol
DS2 Line (EU-22)	-	-	-	-	-	8.76	-	1.66	1.66 - Methanol
DS3 Line (EU-38)	-	-	-	-	-	8.76	-	1.66	1.66 - Methanol
JC-06 Coating Line (EU-44)	0.01	0.01	0.01	-	-	1.04	-	-	-
BZ1 Zinc Plating / Chromium Dip (EU-12)	-	-	-	-	-	0.03	-	1.95	1.56 - HCl
BZ2 Zinc Plating / Chromium Dip (EU-26)	-	-	-	-	-	0.03	-	1.95	1.56 - HCl
BZ3 Zinc Plating / Chromium Dip (EU-41)	-	-	-	-	-	-	-	1.95	1.56 - HCl
BZ4 Zinc Plating / Chromium Dip (EU-50)	-	-	-	-	-	0.03	-	1.95	1.56 - HCl
Oil Quench Line (LOQ2)	-	-	-	-	-	negl	-	-	-

Process/ Emission Unit	Potential To Emit of the Entire Source After this FESOP Administrative Amendment (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
BZ-5	-	-	-	-	-	0.03	-	3.55	3.20
Natural Gas Combustion (multiple units)	0.27	1.08	1.08	0.09	14.26	0.71	10.9	0.24	0.23 - Hexane
Total PTE of Entire Source	237.31	95.9	95.9	0.09	14.26	60.4	12.0	19.6	7.79 - HCl
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
<p>*Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant".</p> <p>¹ PM₁₀ and PM_{2.5} emissions from the 61 head forming machines, 4 nut forming machines, and 6 nut tapping machines are limited to 0.241 pounds per hour, each</p> <p>² The 4 shot blasters are each limited to 7.44 pounds of PM per hour, each, 0.485 tons of total HAPs per year, and 0.358 tons of manganese per year.</p>									

- (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 Revision

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Indiana Automotive Fasteners, Inc. on June 8, 2015, relating to the following:

- (I) Addition of the new emission units described as follows:
 - (a) One (1) dip-spin coating line, identified as DS4, for metal fasteners coating, approved in 2015 for construction, with a maximum capacity of 30,000 fasteners per hour, controlled by a thermal oxidizer (EU-48), exhausting to stack (V48), and consisting of :
 - (i) One (1) dip coating operation, identified as EU-56,
 - (i) One (1) natural gas-fired pre-cure oven, identified as EU-57, with one (1) burner rated at 0.20 MMBtu/hour, and
 - (ii) One (1) natural gas-fired pre-cure oven, identified as EU-58, with 10 burners, each rated at 0.16 MMBtu/hour.
 - (b) One (1) SBL shot blaster, identified as EU-37, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-37) and exhausting inside.
 - (c) One (1) SBL shot blaster, identified as EU-59, approved in 2015 for construction, with a with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-59) and exhausting inside.

- (d) One (1) SBL shot blaster, identified as EU-60, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-60) and exhausting inside.
 - (e) One (1) SBL shot blaster, identified as EU-61, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-61) and exhausting inside.
 - (f) One (1) SBL shot blaster, identified as EU-62, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-62) and exhausting inside.
- (II) Modify the existing emission units as follows:
- (a) Remove 3 head forming machines and add 12 nut tapping machines at EU-6.
 - (b) Rename Dacrotizing Coating Line (DSM) as Dip-spin Coating Line (DSM).
 - (c) Add 5 natural gas fired dry-off ovens, each rated at 0.3 MMBtu/hr, at EU-7.
 - (d) Rename Dacrotizing Coating Line 1 (DS1) as Dip-spin Coating Line 1 (DS1)
 - (e) Add 6 natural gas fired burners, each rated at 0.15 MMBtu/hr, at EU-44.
 - (f) Rename the Dacrotizing Coating Line 2 (DS2) as Dip-spin Coating Line 2 (DS2).
 - (g) Add 11 natural gas fired burners, each rated at 0.7 MMBtu/hr, at EU-22b.
 - (h) Rename the Dacrotizing Coating Line 3 (DS3) as Dip-spin Coating Line 3 (DS3)
- (III) Revise the description of the existing ovens as follows:
- The following ovens are controlled by a thermal oxidizer (EU-48). However, the description of these ovens does reference this control. The description of these ovens will be revised to clarify that these ovens are controlled by the thermal oxidizer (EU-48):
- (a) dry-off oven (EU-7)
 - (b) dacrotizing oven (EU-9a)
 - (c) pre-cure oven (EU-43)
 - (d) curing ovens (EU-44)
 - (e) dry-off oven (EU-22b)
 - (f) pre-cure oven (EU-39)
 - (g) cure oven (EU-40)
- (IV) Revise the existing stack/vent identifications as follows:
- The thermal oxidizer (EU-48) is exhausting to stack (V48). Therefore, the stack/vent identifications of all the existing emission units controlled by the thermal oxidizer (EU-48) will be changed to stack (V48).

Enforcement Issues

IDEM is aware that the shot blasters (EU-37, EU-60, EU-61 and EU-62) have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction and operating permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAPs
twelve (12) nut tapping machines at EU-6	17.95	17.95	17.95	-	-	-	-	1.47	1.24
dip coating operation (EU-56)	-	-	-	-	-	9.51	-	1.66	1.66
SBL shot blaster (EU-37)	12.77	1.28	1.28	-	-	-	-	0.22	0.17
SBL shot blaster (EU-59)	12.77	1.28	1.28	-	-	-	-	0.22	0.17
SBL shot blaster (EU-60)	12.77	1.28	1.28	-	-	-	-	0.22	0.17
SBL shot blaster (EU-61)	12.77	1.28	1.28	-	-	-	-	0.22	0.17
SBL shot blaster (EU-62)	12.77	1.28	1.28	-	-	-	-	0.22	0.17
new natural gas-fired units (new ovens EU-57 and EU-58) and modified ovens (EU-7, EU-44 and EU-22b)	0.09	0.37	0.37	0.03	4.92	0.27	4.13	4.13	0
Total PTE of Proposed Revision	81.89	24.71	24.71	0.03	4.92	9.78	4.13	4.24	3.73

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with PM potential to emit greater than twenty-five (25) tons per year.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing limits), with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After this FESOP Administrative Amendment (tons/year)											
	PM		PM10*		PM2.5*		SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Head Forming & Nut Forming Machines (EU-06) ¹	106.20 80.22		74.95 80.22		74.95 80.22		-	-	9.81	-	1.37 1.47	1.161.24 - Manganese
SBL shot blasterAbrasive Blasting (EU-8a)²	32.6	36.9	6.15	1.85	6.15	1.85	-	-	-	-	0.485	0.358 - Manganese
SBL shot blasterAbrasive Blasting (EU-8b)²	32.6		6.15		6.15		-	-	-	0.485	0.358 - Manganese	
SBL shot blasterAbrasive Blasting (EU-20a)²³	32.6	21.13	3.52	1.06	3.52	1.85	-	-	-	-	0.485	0.358 - Manganese
SBL shot blasterAbrasive Blasting (EU-20b)²³	32.6		3.52		3.52		-	-	-	0.485	0.358 - Manganese	
SBL shot blaster (EU-37) ⁴	3.83		0.38		0.32		-	-	-	-	0.22	0.17- Manganese
SBL shot blaster (EU-59) ⁴	3.83		0.38		0.38		-	-	-	-	0.22	0.17- Manganese
SBL shot blaster (EU-60) ⁴	3.83		0.38		0.38		-	-	-	-	0.22	0.17- Manganese
SBL shot blaster (EU-61) ⁴	3.83		0.38		0.38		-	-	-	-	0.22	0.17- Manganese
SBL shot blaster (EU-62) ⁴	3.83		0.38		0.38		-	-	-	-	0.22	0.17- Manganese
dacrotizing metal treatment processDSM Line (EU-9)	0.31		0.31		0.31		-	-	11.47	-	1.08	0.56 - Xylene
dacrotizing metal treatment processDSM Line (EU-9b)	0.19		0.19		0.19		-	-	10.85	-	0.20	0.20- Xylene
dip coating operationDS1 Line (EU-42)	-		-		-		-	-	8.76	-	1.66	1.66 - Methanol
dip coating operationDS2 Line (EU-22)	-		-		-		-	-	8.76	-	1.66	1.66 - Methanol
dip coating operationDS3 Line (EU-38)	-		-		-		-	-	8.76	-	1.66	1.66 - Methanol
dip coating operation (EU-56)	-		-		-		-	-	9.51	-	1.66	1.66
top coating operationJC-06 Coating Line (EU-44)	0.01		0.01		0.01		-	-	1.04	-	-	-
BZ1-Zinc Plating / Chromium Dip (EU-12)	-		-		-		-	-	0.03	-	1.95	1.56 - HCl
BZ2-Zinc Plating / Chromium Dip (EU-26)	-		-		-		-	-	0.03	-	1.95	1.56 - HCl

Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant".

PM₁₀ and PM_{2.5} emissions from the 6458 head forming machines, 4 nut forming machines, and 618 nut tapping machines are limited to 0.241 pounds per hour, each

~~The 4 shot blasters are each limited to 7.44 pounds of PM per hour, each, 0.485 tons of total HAPs per year, and 0.358 tons of manganese per year.~~

PM, PM₁₀ and PM_{2.5} emissions, each combined from the shot blasters EU-8a and EU-8b, are limited to 8.43, 0.35 and 0.35 pounds per hour, respectively.

PM, PM₁₀ and PM_{2.5} emissions, each combined from the shot blasters EU-20a and EU-20b, are limited to 4.82, 0.24 and 0.24 pounds per hour, respectively.

PM, PM₁₀ and PM_{2.5} emissions from the shot blasters EU-37, EU-59, EU-60, EU-61 and EU-62, are limited to 0.87, 0.09 and 0.09 pounds per hour, respectively.

EU-54 is an existing emission unit. This emission unit was not previously included in the PTE of table of the TSD of 059-35397-00024, issued on March 3, 2015. Therefore, it is now included.

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

Process/ Emission Unit	Potential To Emit of the Entire Source After this FESOP Administrative Amendment (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Head Forming & Nut Forming Machines (EU-06) ¹	80.22	80.22	80.22	-	-	9.81	-	1.47	1.24 - Manganese
SBL shot blaster (EU-8a) ²	36.9	1.85	1.85	-	-	-	-	0.485	0.358 - Manganese
SBL shot blaster (EU-8b) ²				-	-	-	-	0.485	0.358 - Manganese
SBL shot blaster (EU-20a) ³	21.13	1.06	1.85	-	-	-	-	0.485	0.358 - Manganese
SBL shot blaster (EU-20b) ³				-	-	-	-	0.485	0.358 - Manganese
SBL shot blaster (EU-37) ⁴	3.83	0.38	0.32	-	-	-	-	0.22	0.17- Manganese
SBL shot blaster (EU-59) ⁴	3.83	0.38	0.38	-	-	-	-	0.22	0.17- Manganese
SBL shot blaster (EU-60) ⁴	3.83	0.38	0.38	-	-	-	-	0.22	0.17- Manganese
SBL shot blaster (EU-61) ⁴	3.83	0.38	0.38	-	-	-	-	0.22	0.17- Manganese
SBL shot blaster (EU-62) ⁴	3.83	0.38	0.38	-	-	-	-	0.22	0.17- Manganese
dacrotizing metal treatment process (EU-9)	0.31	0.31	0.31	-	-	11.47	-	1.08	0.56 - Xylene
dacrotizing metal treatment process (EU-9b)	0.19	0.19	0.19	-	-	10.85	-	0.20	0.20- Xylene
dip coating operation (EU-42)	-	-	-	-	-	8.76	-	1.66	1.66 - Methanol
dip coating operation (EU-22)	-	-	-	-	-	8.76	-	1.66	1.66 - Methanol
dip coating operation (EU-38)	-	-	-	-	-	8.76	-	1.66	1.66 - Methanol
dip coating operation (EU-56)	-	-	-	-	-	9.51	-	1.66	1.66

Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant".

PM₁₀ and PM_{2.5} emissions from the 58 head forming machines, 4 nut forming machines, and 18 nut tapping machines are limited to 0.241 pounds per hour, each

PM, PM₁₀ and PM_{2.5} emissions, each combined from the shot blasters EU-8a and EU-8b, are limited to 8.43, 0.35 and 0.35 pounds per hour, respectively.

PM, PM₁₀ and PM_{2.5} emissions, each combined from the shot blasters EU-20a and EU-20b, are limited to 4.82, 0.24 and 0.24 pounds per hour, respectively.

PM, PM₁₀ and PM_{2.5} emissions from the shot blasters EU-37, EU-59, EU-60, EU-61 and EU-62, are limited to 0.87, 0.09 and 0.09 pounds per hour, respectively.

EU-54 is an existing emission unit. This emission unit was not previously included in the PTE of table of the TSD of 059-35397-00024, issued on March 3, 2015. Therefore, it is now included.

- (a) **FESOP Status (for PM10 and PM2.5) and PSD Minor Source (for PM)**
This revision 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).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the particulate emissions from the emission units listed below shall not exceed the limits as specified below.

Process	PSD Limit	FESOP Limits		control
	PM (lbs/hr)*	PM10 (lbs/hr)*	PM2.5 (lbs/hr)*	
Head and nut forming machines (EU-06)	0.241 (for each machine at EU-06)	0.241 (for each machine at EU-06)	0.241 (for each machine at EU-06)	Smog Hog Electrostatic Precipitator
SBL shot blaster (EU-8a)	8.43	0.35	0.35	Baghouse/V8
SBL shot blaster (EU-8b)	(total)	(total)	(total)	
SBL shot blaster (EU-20a)	4.82	0.24	0.24	Baghouse/V20
SBL shot blaster (EU-20b)	(total)	(total)	(total)	
SBL shot blaster (EU-37)	0.87	0.09	0.09	baghouse (BH-37)
SBL shot blaster (EU-59)	0.87	0.09	0.09	baghouse (BH-59)
SBL shot blaster (EU-60)	0.87	0.09	0.09	baghouse (BH-60)
SBL shot blaster (EU-61)	0.87	0.09	0.09	baghouse (BH-61)
SBL shot blaster (EU-62)	0.87	0.09	0.09	baghouse (BH-62)

* Limits are after control.

Please refer Appendix A of this TSD for the details of the above limits.

Compliance with the above PM10 and PM2.5 limits in conjunction with PM10 and PM2.5 emissions from other emission units at the source will limit the source-wide PM10 and PM2.5 PTE, each, to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Compliance with the above PM limits in conjunction with PM emissions from other emission units at the source will limit the source-wide PM PTE to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

- (2) **HAPs**
Condition D.2.4 in the existing permit specifies HAPs limits for all the shot blasters to limit the source-wide single HAP and combined HAPs emissions less than 10 and 25 tons/year, respectively, and Condition D.2.10 specifies one time testing for these HAPs limit. The source performed one time HAPs testing on February 26, 2014. The source-wide potential single HAP and combined HAPs emissions are less than 10 and 25 tons per year, respectively (please refer Appendix A of this TSD for the details). Therefore, these HAPs limits and HAPs testing conditions will be removed from the permit.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) Subpart XXXXXX — National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Automotive nuts and bolts shot blasting operations will be performed at the proposed shot blasters (EU-37, EU-59, EU-60, EU-61 and EU-62). This type of operation is not described in Table 1 of this NESHAP. Therefore, these shot blasters are not subject to the requirements of this NESHAP.

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

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 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants 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). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
(a) The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from each of the new and modified emission units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
(b) Condition D.2.4 in the existing permit specifies HAPs limits for the shot blasters to limit the single HAP and combined HAPs emissions from each shot blaster to less than 10 and 25 tons/year, respectively. The uncontrolled potential single HAP and combined HAPs emissions from each shot blaster is less than 10 and 25 tons per year, respectively (please refer Appendix A of this TSD for the details). Therefore, these HAPs limits will be removed from the permit through this revision.
- (e) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

- (f) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.
- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (i) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the emission units listed below shall be limited as specified when operating at the respective process weight rate:

Emission Unit	Process Weight Rate (lb/hr)	Process Weight Rate (tons/hr)	Allowable Particulate Emission Rate (326 IAC 6-3-2) (lb/hr)	control	controlled emissions (lbs/hr)	can comply? (Y/N)
SBL shot blaster (EU-37)	909	0.45	2.42	baghouse (BH-37)	0.87	Y
SBL shot blaster (EU-59)	909	0.45	2.42	baghouse (BH-59)	0.87	Y
SBL shot blaster (EU-60)	909	0.45	2.42	baghouse (BH-60)	0.87	Y
SBL shot blaster (EU-61)	909	0.45	2.42	baghouse (BH-61)	0.87	Y
SBL shot blaster (EU-62)	909	0.45	2.42	baghouse (BH-62)	0.87	Y

The above limits are based on the following:

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:

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

The particulate control shall be in operation at all times the shot blasters are in operation, in order to comply with these limits.

- (ii) The uncontrolled particulate emissions from the following are less than 0.551 pounds per hour, therefore, as pursuant to 326 IAC 6-3-1(b)(14), all these emission units are exempt from 326 IAC 6-3.
- (a) proposed twelve (12) nut tapping machines at EU-6
 - (b) proposed ovens (EU-57 and EU-58)
 - (c) modified ovens (EU-7, EU-44 and EU-22b)
- (h) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)
The proposed ovens (EU-57 and EU-58) and modified ovens (EU-7, EU-44 and EU-22b) are not subject to this rule because they are not source of indirect heating.
- (i) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
- The dip-spin coating line (DS4) (including dip coating operation (EU-56) and ovens (EU-57 and EU-58)) is subject to 326 IAC 8-2-9 because:
- (i) its actual VOC emissions are greater than fifteen (15) pounds per day,
 - (ii) its construction date is after July 1, 1990, and
 - (iii) it coats metal parts or products under the Standard Industrial Classification Code #34.
- (a) Pursuant to 326 IAC 8-2-9(c), the Permittee shall not discharge into the atmosphere VOC from the dip-spin coating line (DS4) in excess of the following:

Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

The dip-spin coating line (DS4) is equipped with a thermal oxidizer (EU-48) to comply with this limit. This oxidizer shall be in operation and control VOC emissions at all times when the dip-spin coating line (DS4) is in operation to comply with this limit.

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

- (b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the dip-spin coating line (DS4) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in paragraph (a) above.

This equivalency was determined by the following equation:

$$E = \frac{L}{\left(1 - \frac{L}{D}\right)}$$

Where:

L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating (3.5 lb/gal);

D = Density of VOC in coating in pounds per gallon of VOC (7.36 lb/gal);

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

$$E = \frac{3.5}{\left(1 - \frac{3.5}{7.36}\right)} = 6.67$$

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2(a).

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than E determined in (b) above.
- (d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and

= procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied
21.08 lb VOC/gal solids (please refer Appendix A of this TSD for the details).

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 68.3%.

- (e) Pursuant to 326 IAC 8-2-9(f), the work practices shall include, but not be limited to, the following:
- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Compliance Determination, Monitoring and Testing Requirements
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- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit	control	Operating Parameters	Frequency
SBL shot blaster (EU-37)	baghouse (BH-37)	pressure drop *	daily
SBL shot blaster (EU-59)	baghouse (BH-59)	pressure drop *	daily
SBL shot blaster (EU-60)	baghouse (BH-60)	pressure drop *	daily
SBL shot blaster (EU-61)	baghouse (BH-61)	pressure drop *	daily
SBL shot blaster (EU-62)	baghouse (BH-62)	pressure drop *	daily
dip-spin coating line (DS4)	thermal oxidizer (EU-48)	combustion temperature **	continuously
		duct pressure or fan amperage **	once a day

* These baghouses are venting inside, therefore, a visible emission monitoring requirement is not included for these baghouses.

** Continuous means no less often than once per fifteen (15) minutes. The output shall be recorded as a 3-hour rolling average temperature. These are existing compliance monitoring requirements and no change has been made to this compliance monitoring requirements due to this revision.

These monitoring conditions are necessary because:

- (i) these baghouse for its respective emission units must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes), 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (PSD), and
- (ii) thermal oxidizer (EU-48) for the dip-spin coating line (DS4) must operate properly to ensure compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating).
- (b) The particulate testing requirements have not been included because 70% control efficiency is used in the limited PTE calculations for all the shot blasters.
- (c) The existing one time PM10 and PM2.5 testing requirement for EU-6 will be removed through this revision because the source has performed this compliance testing on February 26, 2013 and the test results were under the permit limits.
- (d) The most recent VOC overall efficiency test on the existing thermal oxidizer (EU-48) was performed on February 21, 2014. There are no changes in the testing cycle frequency period even with the addition of the new dip spin coating line DS4.

Proposed Changes

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

- (a) The following conditions have been revised for clarification:
 - (i) Section B - Annual Compliance Certification
 - (ii) Section B - Preventive Maintenance
 - (iii) Section C - General Reporting Requirements
- (b) IDEM is changing the Section C Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
- (c) On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The change is only to site of these rules in Section A - General Information, Section A - Emission Units and Pollution Control Equipment Summary, Section A - Specifically Regulated Insignificant Activities, Section B - Preventative Maintenance Plan, Section B - Emergency Provisions, Section B - Operational Flexibility, Section C - Risk Management Plan, the Facility Descriptions, and Section D - Preventative Maintenance Plan.
- (d) There was a typographical error in Condition C.2 - Overall Source Limit. The source-wide PM limit was specified as 100 tons per year instead of 250 tons per year. This error has been corrected.

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

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

- (a) **Fifty-eight (58)**~~Sixty-one (61)~~ head forming machines, four (4) nut forming machines, and ~~six (6)~~**eighteen (18)** nut tapping machines, collectively identified as EU-6, constructed between 1996 and ~~2007~~**2015**, each processing a maximum of 12,000 fasteners per hour (each fastener weighs 0.1 oz), each machine is controlled by its corresponding Smog Hog Electrostatic Precipitator, thirty-five (35) of the head forming machines exhausting to stacks V6:1-11 and the remaining machines exhausting within the building.
- (b) **Dip-spin**~~Dacronizing~~ Coating Line, identified as DSM, constructed in 1996, modified in 2009 and 2010, for the application of corrosion resistant coatings to ferrous-based metal

fasteners, and consisting of:

- (1) One (1) cleaner wash and natural gas fired dry-off oven (DSM), **collectively** identified as EU-7, **each oven** rated at 0.3 MMBtu/hr, ~~uncontrolled, and exhausting to stacks V7A and V7B~~ **controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48);**
 - (2) Two (2) SBL shot blasters (DSM), identified as EU-8a and EU-8b, each using a maximum of 773 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V8;
 - (3) One (1) dacrotizing metal treatment process (DSM), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour **and exhausting to stack (V48);**
 - (4) One (1) natural gas fired dacrotizing oven, identified as EU-9a, constructed in 1996, rated at 1.0 MMBtu/hr, ~~uncontrolled, and exhausting to stack V9~~ **controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48); and**
 - (5) One (1) dacrotizing metal treatment process (DSM), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, ~~and exhausting to stack V9~~ **and exhausting to stack (V48).**
- (c) **Dip-spinDacrotizing** Coating Line 1, identified as DS1, constructed in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, **controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48)** and consisting of:
- (1) One (1) dip coating operation (DS1), identified as EU-42, with a maximum throughput of 30,000 parts/fasteners per hour, ~~controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V42;~~
 - (2) One (1) natural gas-fired pre-cure oven (DS1), identified as EU-43, constructed in 2011, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), ~~and exhausting through Stack V-44;~~ and
 - (3) One (1) natural gas-fired curing oven, consisting of ~~six (6)~~ **twelve (12)** burners, each rated at 0.15 MMBtu/hr, constructed in 2011, collectively identified as EU-44, with a combined maximum heat input capacity of ~~0.901.8~~ **1.8** MMBtu/hr, ~~exhausting through Stacks V-43A and V-43B.~~
- (d) **Dip-spinDacrotizing** Coating Line 2, identified as DS2, constructed in 2002, modified in 2012 for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
- (1) Two (2) SBL shot blasters (DS2), identified as EU-20a, and EU-20b, each using a maximum of 775 pounds per hour of steel shot, controlled by one (1) baghouse, and exhausting to stack V20;
 - (2) One (1) cleaner wash and natural gas fired dry-off oven (DS2), identified as EU-21, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V21-A and V21-B;
 - (3) One (1) dip coating operation (DS2), identified as EU-22, processing a maximum of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as

- EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack ~~V22-A~~(V48);
- (4) One (1) natural gas fired dry-off oven (DS2), identified as EU-22b, rated at 0.7 MMBtu/hr, ~~and exhausting to stack V22-B~~**controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48).**
- (e) Dacrotizing Line 3, identified as DS3, constructed in 2009, modified in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
- (1) Reserved.
- (2) One (1) dip coating operation (DS3), identified as EU-38, with a maximum throughput of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack ~~V39~~(V48);
- (3) One (1) natural gas fired pre-cure oven (DS3), identified as EU-39, with one (1) burner rated at 0.14 MMBtu/hr, ~~uncontrolled and exhausted through stack V39~~**controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48).**
- (4) One (1) natural gas fired cure oven (DS3) with a cooling zone, identified as EU-40, with six (6) burners rated at 0.16 MMBtu/hr, each, ~~uncontrolled and exhausted through stacks V40-A & V40-B~~**controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48).**
- (f) One (1) **natural gas-fired** thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, ~~used as control for emission units: DSM, DS1, DS2 and DS3. Stacks V9 (DSM), V42 (DS1), V22A (DS2) and V39 (DS3) will vent emissions to a header and then to the thermal oxidizer (EU-48) and exhausting to stack V47~~(V48).
- ...
- (n) **One (1) dip-spin coating line, identified as DS4, for metal fasteners coating, approved in 2015 for construction, with a maximum capacity of 30,000 fasteners per hour, controlled by a thermal oxidizer (EU-48), exhausting to stack (V48), and consisting of :**
- (i) **One (1) dip coating operation, identified as EU-56,**
- (i) **One (1) natural gas-fired pre-cure oven, identified as EU-57, with one (1) burner rated at 0.20 MMBtu/hour, and**
- (ii) **One (1) natural gas-fired pre-cure oven, identified as EU-58, with 10 burners, each rated at 0.16 MMBtu/hour.**
- (o) **One (1) SBL shot blaster, identified as EU-37, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-37) and exhausting inside.**
- (p) **One (1) SBL shot blaster, identified as EU-59, approved in 2015 for construction, with a with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-59) and exhausting inside.**

- (q) One (1) SBL shot blaster, identified as EU-60, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-60) and exhausting inside.
- (r) One (1) SBL shot blaster, identified as EU-61, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-61) and exhausting inside.
- (s) One (1) SBL shot blaster, identified as EU-62, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-62) and exhausting inside.

...

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. **AllThe initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent** 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:

...

...

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.~~

- ~~(ba)~~ 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:

...

- ~~(eb)~~ ...

(d)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(4042). 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).

. . .

. . .

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

. . .

- (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.

. . .

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

. . .

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM₁₀), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- . . .
- (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~~two hundred **fifty** (~~400~~**250**) tons per twelve (12) consecutive month period.

. . .

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

C.12 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

. . .

- (b) **For existing units:**
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 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, the Permittee may

extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

...

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

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

...

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Head forming machines

- (a) **Fifty-eight (58)** ~~Sixty-one (61)~~ head forming machines, four (4) nut forming machines, and ~~six (6)~~ **eighteen (18)** nut tapping machines, collectively identified as EU-6, constructed between 1996 and ~~2007~~ **2015**, each processing a maximum of 12,000 fasteners per hour (each fastener weighs 0.1 oz), each machine is controlled by its corresponding Smog Hog Electrostatic Precipitator, thirty-five (35) of the head forming machines exhausting to stacks V6:1-11 and the remaining machines exhausting within the building.

...

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

D.1.1 FESOP Limits: PM₁₀, PM_{2.5} [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

- (a) The PM₁₀ emissions from the ~~64~~ **58** head forming machines, 4 nut forming machines and ~~6~~ **18** nut tapping machines of EU-6 shall not exceed 0.241 pounds per hour, each.
- (b) The PM_{2.5} emissions from the ~~64~~ **58** head forming machines, 4 nut forming machines and ~~6~~ **18** nut tapping machines of EU-6 shall not exceed 0.241 pounds per hour, each.

Compliance with these **above PM₁₀ and PM_{2.5} limits, in conjunction with the Condition D.2.1 and combined with the potential to emit PM₁₀ and PM_{2.5} from all other emission units at this source, shall limit the source-wide total potential to emit of PM₁₀ and PM_{2.5}, to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits), not applicable.**

D.1.2 PSD Minor Limit: PM [326 IAC 2-2]

In order to render 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

- (a) **The PM emissions from the 58 head forming machines, 4 nut forming machines and 18 nut tapping machines of EU-6 shall not exceed 0.241 pounds per hour, each.**

Compliance with the above PM limit, in conjunction with the Condition D.2.2 and 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, each, and shall render 326 IAC 2-2 (PSD), not applicable.

D.1.3D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

...

Compliance Determination Requirements

D.1.4D.1.3 Particulate Control

In order to comply with Conditions **D.1.1 and D.1.2** and to assure that each machine of EU-6 is exempted from 326 IAC 6-3, the electrostatic precipitators for particulate control shall be in operation and control emissions from each of the head and nut forming machines and nut tapping machines at all times that any of the head and nut forming machines and nut tapping machines ~~are~~ is in operation.

D.1.4 ~~PM₁₀ and PM_{2.5} Control~~

~~In order to comply with Condition D.1.1, the Smog Hog Electrostatic Precipitator for PM₁₀ and PM_{2.5} control shall be in operation and control emissions from the 61 head forming machines, four (4) nut forming machines, and six (6) nut tapping machines collectively identified as EU-6, are in operation.~~

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]

D.1.5 Visible Emissions Notations

...

D.1.6 ~~Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]~~

~~In order to demonstrate compliance with Condition D.1.4, the Permittee shall perform a one time test for PM₁₀ and PM_{2.5} on one of the Electrostatic Precipitators (ESP) exhausting to a stack (V6:1-11), utilizing methods as approved by the Commissioner not later than one hundred and eighty (180) days after the issuance of this permit. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C — Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]

D.1.7D.1.6 Record Keeping Requirements

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Dacrotizing Coating

(b) ~~Dip-spin~~Dacrotizing Coating Line, identified as DSM, constructed in 1996, modified in 2009 and 2010, for the application of corrosion resistant coatings to ferrous-based metal fasteners, and consisting of:

- (1) One (1) cleaner wash and natural gas fired dry-off oven (DSM), **collectively** identified as EU-7, **each oven** rated at 0.3 MMBtu/hr, ~~uncontrolled, and exhausting to stacks V7A and V7B~~**controlled by a thermal oxidizer (EU-48) and exhausting to stack**

(V48);

- (2) . . .
 - (3) One (1) dacrotizing metal treatment process (DSM), identified as EU-9, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour **and exhausting to stack (V48);**
 - (4) One (1) natural gas fired dacrotizing oven, identified as EU-9a, constructed in 1996, rated at 1.0 MMBtu/hr, ~~uncontrolled, and exhausting to stack V9~~ **controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48); and**
 - (5) One (1) dacrotizing metal treatment process (DSM), identified as EU-9b, dip coating a maximum of 880 pounds of fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, ~~and exhausting to stack V9~~ **and exhausting to stack (V48).**
- (c) **Dip-spinDacrotizing Coating Line 1**, identified as DS1, constructed in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, **controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48)** and consisting of:
- (1) One (1) dip coating operation (DS1), identified as EU-42, with a maximum throughput of 30,000 parts/fasteners per hour, ~~controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack V42;~~
 - (2) One (1) natural gas-fired pre-cure oven (DS1), identified as EU-43, constructed in 2011, with a maximum heat input capacity of 0.14 million British thermal units per hour (MMBtu/hr), ~~and exhausting through Stack V-44;~~ and
 - (3) One (1) natural gas-fired curing oven, consisting of ~~six (6)~~ **twelve (12)** burners, each rated at 0.15 MMBtu/hr, constructed in 2011, collectively identified as EU-44, with a combined maximum heat input capacity of ~~0.901.8~~ **1.8** MMBtu/hr, ~~exhausting through Stacks V-43A and V-43B.~~
- (d) **Dip-spinDacrotizing Coating Line 2**, identified as DS2, constructed in 2002, modified in 2012 for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:
- (1) . . .
 - (2) One (1) cleaner wash and natural gas fired dry-off oven (DS2), identified as EU-21, rated at 0.3 MMBtu/hr, uncontrolled, and exhausting to stacks V21-A and V21-B;
 - (3) One (1) dip coating operation (DS2), identified as EU-22, processing a maximum of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack ~~V22-A~~ **(V48);**
 - (4) One (1) natural gas fired dry-off oven (DS2), identified as EU-22b, rated at 0.7 MMBtu/hr, ~~and exhausting to stack V22-B~~ **controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48).**
- (e) **Dacrotizing Line 3**, identified as DS3, constructed in 2009, modified in 2012, for the application of corrosion resistant coatings to ferrous based metal fasteners, and consisting of:

- (1) Reserved.
- (2) One (1) dip coating operation (DS3), identified as EU-38, with a maximum throughput of 30,000 parts/fasteners per hour, controlled with a thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, and exhausting to stack ~~V39~~**(V48)**;
- (3) One (1) natural gas fired pre-cure oven (DS3), identified as EU-39, with one (1) burner rated at 0.14 MMBtu/hr, ~~uncontrolled and exhausted through stack V39~~**controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48)**.
- (4) One (1) natural gas fired cure oven (DS3) with a cooling zone, identified as EU-40, with six (6) burners rated at 0.16 MMBtu/hr, each, ~~uncontrolled and exhausted through stacks V40-A & V40-B~~**controlled by a thermal oxidizer (EU-48) and exhausting to stack (V48)**.
- (f) One (1) **natural gas-fired** thermal oxidizer, identified as EU-48, with a maximum heat input capacity of 1.7 MMBtu/hour, ~~used as control for emission units: DSM, DS1, DS2 and DS3. Stacks V9 (DSM), V42 (DS1), V22A (DS2) and V39 (DS3) will vent emissions to a header and then to the thermal oxidizer (EU-48) and exhausting to stack V47~~**(V48)**.
- ...
- (n) **One (1) dip-spin coating line, identified as DS4, for metal fasteners coating, approved in 2015 for construction, with a maximum capacity of 30,000 fasteners per hour, controlled by a thermal oxidizer (EU-48), exhausting to stack (V48), and consisting of :**
 - (i) **One (1) dip coating operation, identified as EU-56,**
 - (i) **One (1) natural gas-fired pre-cure oven, identified as EU-57, with one (1) burner rated at 0.20 MMBtu/hour, and**
 - (ii) **One (1) natural gas-fired pre-cure oven, identified as EU-58, with 10 burners, each rated at 0.16 MMBtu/hour.**
- (o) **One (1) SBL shot blaster, identified as EU-37, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-37) and exhausting inside.**
- (p) **One (1) SBL shot blaster, identified as EU-59, approved in 2015 for construction, with a with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-59) and exhausting inside.**
- (q) **One (1) SBL shot blaster, identified as EU-60, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-60) and exhausting inside.**
- (r) **One (1) SBL shot blaster, identified as EU-61, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-61) and exhausting inside.**
- (s) **One (1) SBL shot blaster, identified as EU-62, approved in 2015 for construction, with a maximum throughput of 343 pounds of metal fasteners per hour and 560 pounds of steel shot per hour, controlled by a baghouse (BH-62) and exhausting inside.**

...

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

D.2.1 FESOP Limits: PM10 and PM2.5 [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

Shotblaster ID	PM10 (lbs/hr)*	PM2.5 (lbs/hr)*	control
SBL shot blaster (EU-8a)	0.35 (total)	0.35 (total)	Baghouse/V8
SBL shot blaster (EU-8b)			
SBL shot blaster (EU-20a)	0.24 (total)	0.24 (total)	Baghouse/V20
SBL shot blaster (EU-20b)			
SBL shot blaster (EU-37)	0.09	0.09	baghouse (BH-37)
SBL shot blaster (EU-59)	0.09	0.09	baghouse (BH-59)
SBL shot blaster (EU-60)	0.09	0.09	baghouse (BH-60)
SBL shot blaster (EU-61)	0.09	0.09	baghouse (BH-61)
SBL shot blaster (EU-62)	0.09	0.09	baghouse (BH-62)

* Limits are after control.

Compliance with the above PM10 and PM2.5 limits, in conjunction with the Condition D.1.1 and potential to emit PM₁₀ and PM_{2.5} from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM_{2.5}, to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

D.2.2D.2.4 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

Shotblaster ID	Control/Stack	PM Limit (lbs/hr)
SBL shot blaster DSM (EU-8a)	Baghouse/V8	7.44
SBL shot blaster DSM (EU-8b)	Baghouse/V8	7.44
SBL shot blaster DS2 (EU-20a)	Baghouse/V20	7.44
SBL shot blaster DS2 (EU-20b)	Baghouse/V20	7.44
SBL shot blaster (EU-37)	baghouse (BH-37)	0.87
SBL shot blaster (EU-59)	baghouse (BH-59)	0.87
SBL shot blaster (EU-60)	baghouse (BH-60)	0.87
SBL shot blaster (EU-61)	baghouse (BH-61)	0.87
SBL shot blaster (EU-62)	baghouse (BH-62)	0.87

Compliance with these limits, in conjunction with the Condition D.1.2 and~~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 two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.3D.2.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [326 IAC 2(b)]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water from each of these emission units: DSM EU-9, DSM EU9b, DS2 EU-22, DS3 EU-

38, ~~and~~ DS1 EU-42 **and DS4**, as delivered to the applicator.

- (b) When using non-compliant coatings, the Permittee shall comply with the following:
- (1) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from emissions units DSM EU-9, DSM EU9b, DS2 EU-22, DS3 EU-39, ~~and~~ DS1 EU-42 **and DS4** shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids.
...
 - (2) ...
 - (3) ...

The overall efficiency of the thermal oxidizer shall be greater than ~~65.64~~**68.3**%.

D.2.4D.2.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), when using solvents for clean-up at emission units EU-9, EU9b, EU-22, EU-38, ~~and~~ EU-42 **and DS4**, work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

...

D.2.4 Hazardous Air Pollutants (HAP) [326 IAC 2-4.1] [326 IAC 2-8-4]

The total HAP and manganese emissions from the five (5) shotblast units shall not exceed the following per twelve (12) consecutive month period:

Shotblaster ID	Control/Stack	Total HAPs Limit (tons/yr)	Manganese Limit (tons/yr)
SBL DSM (EU-8a)	Baghouse/V8	0.485	0.358
SBL DSM (EU-8b)	Baghouse/V8	0.485	0.358
SBL DS2 (EU-20a)	Baghouse/V20	0.485	0.358
SBL DS2 (EU-20b)	Baghouse/V20	0.485	0.358

Compliance with these limits shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

D.2.5 Particulate [326 IAC 6-3-2]

(Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Shotblaster ID	Control/Stack	Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
SBL shot blasterDSM (EU-8a)	Baghouse/V8	0.83	3.62

SBL shot blasterDSM (EU-8b)	Baghouse/V8	0.83	3.62
SBL shot blasterDS2 (EU-20a)	Baghouse/V20	0.47	2.47
SBL shot blasterDS2 (EU-20b)	Baghouse/V20	0.47	2.47
SBL shot blaster (EU-37)	Baghouse (BH-37)	0.17	1.26
SBL shot blaster (EU-59)	Baghouse (BH-59)	0.17	1.26
SBL shot blaster (EU-60)	Baghouse (BH-60)	0.17	1.26
SBL shot blaster (EU-61)	Baghouse (BH-61)	0.17	1.26
SBL shot blaster (EU-62)	Baghouse (BH-62)	0.17	1.26

...

D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

...

Compliance Determination Requirements

D.2.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition **D.2.3D.2.2** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and to comply with Condition **D.2.3D.2.2**, the Permittee shall operate the thermal oxidizer (EU-48) at all times.

D.2.9 Particulate Control

(a) In order to comply with Conditions D.2.1, **D.2.2D.2.4** and D.2.5, the baghouses and cartridge filter for particulate control shall be in operation and control emissions from the shotblasters EU-8a, EU-8b, EU-20a, and EU-20b-, **EU-37, EU-59, EU-60, EU-61 and EU-62** are in operation.

(b) ...

D.2.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

~~(a)~~ In order to demonstrate compliance with Condition **D.2.3D.2.2**, the Permittee shall perform VOC testing of the thermal oxidizer (EU-48), utilizing methods as approved by the Commissioner **no later than five (5) years after the most recent testing**~~not later than sixty days after the installation of the last emission unit is connected to the thermal oxidizer or not later than May 31, 2013, whichever is earlier and then. This testing shall be repeated~~ at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

~~(b)~~ In order to demonstrate compliance with Condition D.2.4, the Permittee shall perform a one time test for Manganese on one of the baghouses exhausting to stacks (V8, V20), utilizing methods as approved by the Commissioner not later than one hundred and eighty (180) days after the issuance of this permit. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance

~~testing required by this condition.~~

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]

D.2.11 Visible Emissions Notations

...

D.2.12 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour **rolling** average. From the date of startup until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour **rolling** average temperature of at least 1,400 degrees Fahrenheit.
- (b) The Permittee shall determine the 3-hour **rolling** average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.2, as approved by IDEM.
- (c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour **rolling** average temperature as observed during the compliance stack test.

D.2.13 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across each of the baghouses used in conjunction with each of the shotblasters (EU-8a, EU-8b, EU-20a, ~~and EU-20b~~, **EU-37, EU-59, EU-60, EU-61 and EU-62**), at least once per day when any of the shotblasters are in operation. When for any one reading, the pressure drop across each of the baghouses is outside the normal range, the Permittee shall take reasonable response steps. The normal range for this unit is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit. A pressure reading that is outside the above mentioned range is not a deviation from this permit.

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D.2.14 Broken or Failed Bag Detection

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Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-8-4(3)]

D.2.15 Record Keeping Requirements

- (a) To document the compliance status with Conditions ~~D.2.3D.2.2 and D.2.7~~, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition ~~D.2.3D.2.2~~.
- (b) To document the compliance status with Condition D.2.11, the Permittee shall maintain a daily record of visible emission notations of the shotblasters stack exhausts (**V8 and V20**). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).

- (c) To document the compliance status with Condition D.2.12, the Permittee shall maintain continuous temperature records (on a 3-hour **rolling** average basis) for the thermal oxidizer and the 3-hour **rolling** average temperature used to demonstrate compliance during the most recent compliant stack test.
- (d) To document the compliance status with Condition D.2.13(a), the Permittee shall maintain a daily record of the pressure drop across the baghouses controlling the shotblasters. 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).

...

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 (date). Additional information was received on June 8, 2015.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 059-35923-00024. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to (permit writer's name) 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) (phone number) or toll free at 1-800-451-6027 extension (extension number).
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emission Calculations

Source Summary

Company Name: Indiana Automotive Fasteners, Inc.

Address City IN Zip: 1300 West Anderson Boulevard

Significant Permit Revision Number: 059-35923-00024

Reviewer: Mehul Sura

Date: 7/30/2015

Unlimited Potential to Emit (PTE) (tons/yr)

Process/Emission Unit:	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Single HAPs	
Head and nut forming machines (EU-06)	113.7	113.7	113.7	-	-	9.81	-	1.47	1.24	Manganese
SBL shot blaster (EU-8a)	61.5	6.15	6.15	-	-	-	-	1.08	0.80	Manganese
SBL shot blaster (EU-8b)	61.5	6.15	6.15	-	-	-	-	1.08	0.80	Manganese
SBL shot blaster (EU-20a)	35.2	3.52	3.52	-	-	-	-	0.62	0.46	Manganese
SBL shot blaster (EU-20b)	35.2	3.52	3.52	-	-	-	-	0.62	0.46	Manganese
SBL shot blaster (EU-37)	12.8	1.28	1.28					0.22	0.17	Manganese
SBL shot blaster (EU-59)	12.77	1.28	1.28					0.22	0.17	Manganese
SBL shot blaster (EU-60)	12.77	1.28	1.28					0.22	0.17	Manganese
SBL shot blaster (EU-61)	12.77	1.28	1.28					0.22	0.17	Manganese
SBL shot blaster (EU-62)	12.77	1.28	1.28					0.22	0.17	Manganese
dacrotizing metal treatment process (EU-9)	0.31	0.31	0.31	-	-	11.47	-	0.72	0.20	Xylene
dacrotizing metal treatment process (EU-9b)	0.19	0.19	0.19	-	-	10.85	-	1.28	0.72	Xylene
dip coating operation (EU-42)	-	-	-	-	-	8.76	-	1.66	1.66	Methanol
dip coating operation (EU-22)	-	-	-	-	-	8.76	-	1.66	1.66	Methanol
dip coating operation (EU-38)	-	-	-	-	-	8.76	-	1.66	1.66	Methanol
dip coating operation (EU-56)	-	-	-	-	-	9.51	-	1.66	1.66	Methanol
top coating operation (EU-45)	0.01	0.01	0.01	-	-	1.04	-	-	-	-
Zinc Plating / Chromium Dip (EU-12)	-	-	-	-	-	0.03	-	1.95	1.56	HCl
Zinc Plating / Chromium Dip (EU-26)	-	-	-	-	-	0.03	-	1.95	1.56	HCl
Zinc Plating / Chromium Dip (EU-41)	-	-	-	-	-	-	-	1.95	1.56	HCl
Zinc Plating / Chromium Dip (EU-50)	-	-	-	-	-	0.03	-	1.95	1.56	HCl
Zinc Plating / Chromium Dip (EU-54)	-	-	-	-	-	0.03	-	1.95	1.56	HCl
Natural Gas Combustion (Multiple)	0.36	1.46	1.46	0.11	19.16	1.05	16.09	0.36	0.34	Hexane
Total	371.8	141.4	141.4	0.1	19.16	70.1	16.1	24.7	7.79	HCl

Limited Potential to Emit (PTE) (tons/yr)

Process/Emission Unit:	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Single HAPs	
Head and nut forming machines (EU-06)	80.2	80.22	80.22	-	-	9.81	-	1.47	1.24	Manganese
SBL shot blaster (EU-8a)	36.90	1.85	1.85	-	-	-	-	0.485	0.358	Manganese
SBL shot blaster (EU-8b)				-	-	-	-	0.485	0.358	Manganese
SBL shot blaster (EU-20a)	21.1	1.06	1.06	-	-	-	-	0.485	0.358	Manganese
SBL shot blaster (EU-20b)				-	-	-	-	0.485	0.358	Manganese
SBL shot blaster (EU-37)	3.83	0.38	0.38					0.223	0.17	Manganese
SBL shot blaster (EU-59)	3.83	0.38	0.38					0.22	0.17	Manganese
SBL shot blaster (EU-60)	3.83	0.38	0.38					0.22	0.17	Manganese
SBL shot blaster (EU-61)	3.83	0.38	0.38					0.22	0.17	Manganese
SBL shot blaster (EU-62)	3.83	0.38	0.38					0.22	0.17	Manganese
dacrotizing metal treatment process (EU-9)	0.31	0.31	0.31	-	-	11.47	-	1.08	0.56	Xylene
dacrotizing metal treatment process (EU-9b)	0.19	0.19	0.19	-	-	10.85	-	0.20	0.20	Xylene
dip coating operation (EU-42)	-	-	-	-	-	8.76	-	1.66	1.66	Methanol
dip coating operation (EU-22)	-	-	-	-	-	8.76	-	1.66	1.66	Methanol
dip coating operation (EU-38)	-	-	-	-	-	8.76	-	1.66	1.66	Methanol
dip coating operation (EU-56)	-	-	-	-	-	9.51	-	1.66	1.66	Methanol
top coating operation (EU-45)	0.01	0.01	0.01	-	-	1.04	-	-	-	-
Zinc Plating / Chromium Dip (EU-12)	-	-	-	-	-	0.03	-	1.95	1.56	HCl
Zinc Plating / Chromium Dip (EU-26)	-	-	-	-	-	0.03	-	1.95	1.56	HCl
Zinc Plating / Chromium Dip (EU-41)	-	-	-	-	-	-	-	1.95	1.56	HCl
Zinc Plating / Chromium Dip (EU-50)	-	-	-	-	-	0.03	-	1.95	1.56	HCl
Zinc Plating / Chromium Dip (EU-54)	-	-	-	-	-	0.03	-	1.95	1.56	HCl
Natural Gas Combustion (Multiple)	0.36	1.46	1.46	0.11	19.16	1.05	16.09	0.36	0.34	Hexane
Total	158.27	86.99	86.99	0.11	19.16	70.14	16.09	22.56	7.79	HCl

Appendix A: Emission Calculations
Head and nut forming machines (EU-06) - PM, MHAPs

Company Name: Indiana Automotive Fasteners, Inc.
Address City IN Zip: 1300 West Anderson Boulevard
Significant Permit Revision Number: 059-35923-00024
Reviewer: Mehul Sura
Date: 7/30/2015

						Controlled PTE of PM for each machine		Uncontrolled PTE of PM for each machine		each machine	
	No. of units	Outlet grain loading (gr/ascf)	Face velocity (ft/sec)	Total face surface area (ft²)	Control efficiency	lb/hr	ton/yr	lb/hr	ton/yr	PM, PM10 and PM2.5 Permit Limit for each units (lb/hr)	PM, PM10 and PM2.5 Limited PTE for each units (tons/hr)
Existing machines	76	0.001	8.3	8.0	90%	0.03	0.15	0.34	1.50	0.241	1.056
proposed twelve (12) nut tapping machines	12										
Total for all units:						2.60	11.37	25.95	113.67		80.22

Metal Hazardous air pollutants (MHAPs)

Chromium		Manganese		Nickel		PTE of Total MHAPs (ton/yr)
% Weight	Uncontrolled PTE (ton/yr)	% Weight	Uncontrolled PTE (ton/yr)	% Weight	Uncontrolled PTE (ton/yr)	
0.18%	0.20	1.09%	1.24	0.02%	0.02	1.466

IAC 6-3-2 Limit

Process weight rate (ton/hr)	Allowable emissions (lb/hr)
0.04	0.45

Notes:

PM = PM₁₀ = PM_{2.5}

Metal HAPS are particulate in nature and can be controlled using a control device.

Due to calculation errors, the PTE of MHAPs is lower than previously stated in Appendix A to the TSD for FESOP minor source revision #059-32958-00024

Methodology:

Controlled PTE of PM (lb/hr) = Outlet grain loading (gr/ascf) * 1 lb/7000 grains * Face velocity (ft/sec) * Total face surface area (ft²) * 60 sec/min * 60 min/hr

Controlled PTE of PM (ton/yr) = Controlled PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Uncontrolled PTE of PM = Controlled PTE / (1 - Control efficiency)

Uncontrolled PTE of HAPs (ton/yr) = Weight % HAP * Uncontrolled PTE of PM (ton/yr)

Process weight rate (ton/hr) = 12,000 Fasteners/hour per machine * (0.1 oz/fastener) * (1 lb/16 oz) * (1 ton/2000 lb)

Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)^{0.67}, pursuant to 326 IAC 6-3-2(e)

Limited PTE (lb/hr) = Uncontrolled Emissions (lb/hr) x [1 - (Control Efficiency (%) / 100)]

Appendix A: Emission Calculations
Head and nut forming machines (EU-06) - VOC

Company Name: Indiana Automotive Fasteners, Inc.
Address City IN Zip: 1300 West Anderson Boulevard
Significant Permit Revision Number: 059-35923-00024
Reviewer: Mehul Sura
Date: 7/30/2015

Process	Material	Density (lb/gal)	Weight % VOC	Actual usage (gal/yr)	Actual hrs used (hrs/yr)	Maximum usage (gal/hr)	Percent Recovered	VOC content (lb/gal coating)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)
Headforming machine	Apollo Hydraulic Fluid AW-68	7.37	80.0%	17,733	6,000	2.96	90%	5.90	1.74	41.82	7.63
Rolling oil	Daphne Fluid10-U	7.26	90.0%	4,560	6,000	0.76	90%	6.53	0.50	11.92	2.18
Total:									2.24	53.74	9.81

Methodology:

Maximum usage (gal/hr) = Actual usage (gal/yr) / Actual hrs used (hrs/yr)

VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC

PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Maximum usage (gal/hr) * (1-Percent Recovery)

PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day

PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Shot blasters

Company Name: Indiana Automotive Fasteners, Inc.
Address City IN Zip: 1300 West Anderson Boulevard
Significant Permit Revision Number: 059-35923-00024
Reviewer: Mehul Sura
Date: 7/30/2015

Uncontrolled PTE			Emission factors		Uncontrolled PTE - PM		Uncontrolled PTE - PM ₁₀		Control Efficiency	Limited PTE - PM		Limited PTE - PM ₁₀		control
Emission Unit	Abrasive type	Maximum throughput (tons/hr)	PM (lb/ton steel)	PM ₁₀ (lb/ton steel)	lb/hr	ton/yr	lb/hr	ton/yr		lb/hr	ton/yr	lb/hr	ton/yr	
SBL shot blaster (EU-8a)	Steel shot	0.826	17.000	1.70	14.042	61.504	1.404	6.150	70%	8.43	36.90	0.42	1.85	Baghouse/V8
SBL shot blaster (EU-8b)	Steel shot	0.826	17.000	1.70	14.042	61.504	1.404	6.150						
SBL shot blaster (EU-20a)	Steel shot	0.473	17.000	1.70	8.041	35.220	0.804	3.522						
SBL shot blaster (EU-20b)	Steel shot	0.473	17.000	1.70	8.041	35.220	0.804	3.522	70%	4.82	21.13	0.24	1.06	Baghouse/V20
SBL shot blaster (EU-37)	Steel shot	0.1715	17.000	1.70	2.916	12.770	0.292	1.277						
SBL shot blaster (EU-59)	Steel shot	0.1715	17.000	1.70	2.916	12.770	0.292	1.277						
SBL shot blaster (EU-60)	Steel shot	0.1715	17.000	1.70	2.916	12.770	0.292	1.277	70%	0.87	3.83	0.09	0.38	baghouse (BH-37)
SBL shot blaster (EU-61)	Steel shot	0.1715	17.000	1.70	2.916	12.770	0.292	1.277						
SBL shot blaster (EU-62)	Steel shot	0.1715	17.000	1.70	2.916	12.770	0.292	1.277						
Total uncontrolled PTE:					44.2	193.4	4.4	19.3		13.2	58.0	0.7	2.9	

Metal Hazardous air pollutants (MHAPs)

Emission Unit	Chromium		Manganese		Nickel		PTE of Total HAPs (ton/yr)
	% Weight	Uncontrolled PTE (ton/yr)	% Weight	Uncontrolled PTE (ton/yr)	% Weight	Uncontrolled PTE (ton/yr)	
SBL shot blaster (EU-8a)	0.25%	0.154	1.30%	0.800	0.20%	0.123	1.076
SBL shot blaster (EU-8b)	0.25%	0.154	1.30%	0.800	0.20%	0.123	1.076
SBL shot blaster (EU-20a)	0.25%	0.088	1.30%	0.458	0.20%	0.070	0.616
SBL shot blaster (EU-20b)	0.25%	0.088	1.30%	0.458	0.20%	0.070	0.616
SBL shot blaster (EU-37)	0.25%	0.032	1.30%	0.166	0.20%	0.026	0.223
SBL shot blaster (EU-59)	0.25%	0.032	1.30%	0.166	0.20%	0.026	0.223
SBL shot blaster (EU-60)	0.25%	0.032	1.30%	0.166	0.20%	0.026	0.223
SBL shot blaster (EU-61)	0.25%	0.032	1.30%	0.166	0.20%	0.026	0.223
SBL shot blaster (EU-62)	0.25%	0.032	1.30%	0.166	0.20%	0.026	0.223
Total:	0.48		2.51		0.39		3.39

Notes:

Emission factors are from US EPA WebFIRE, for grey iron foundry grinding/cleaning (SCC# 3-04-003-40)

PM₁₀ = PM_{2.5}

Due to calculation errors, the PTE of MHAPs is lower than previously stated in Appendix A to the TSD for FESOP minor source revision #059-32958-00024

Methodology:

Uncontrolled PTE of PM/PM₁₀ (lb/hr) = Maximum throughput (lb/hr) * PM/PM₁₀ emission factor (lb/lb steel)

Uncontrolled PTE (ton/yr) = Uncontrolled PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Controlled PTE = Uncontrolled PTE * (1 - Control efficiency)

Uncontrolled PTE of HAPs (ton/yr) = Weight % HAP * Uncontrolled PTE of PM (ton/yr)

Limited PTE (lb/hr) = Uncontrolled Emissions (lb/hr) x [1 - (Control Efficiency (%) / 100)]

Limited Emissions (tons/yr) = Limited PTE (lb/hr) x [8760 (hrs/yr) / 2000 (lbs/ton)]

326 IAC 6-3-2 Limit

Emission Unit	Process weight rate (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)	uncontrolled emission (lbs/hr)	Control efficiency needed	controlled emission (lbs/hr)
SBL shot blaster (EU-8a)	773	0.83	3.61	14.04	75.0%	3.51
SBL shot blaster (EU-8b)	773	0.83	3.61	14.04	75.0%	3.51
SBL shot blaster (EU-20a)	775	0.47	2.48	8.04	75.0%	2.01
SBL shot blaster (EU-20b)	775	0.47	2.48	8.04	75.0%	2.01
SBL shot blaster (EU-37)	909	0.17	1.26	2.92	75.0%	0.73
SBL shot blaster (EU-59)	909	0.17	1.26	2.92	75.0%	0.73
SBL shot blaster (EU-60)	909	0.17	1.26	2.92	75.0%	0.73
SBL shot blaster (EU-61)	909	0.17	1.26	2.92	75.0%	0.73
SBL shot blaster (EU-62)	909	0.17	1.26	2.92	75.0%	0.73

Methodology:

Process weight rate (ton/hr) = (Material throughput (lb/hr) + Steel shot throughput (lb/hr)) / 2000 lb/ton

Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)^{0.67}, pursuant to 326 IAC 6-3-2(e)

Control efficiency needed = 1 - (Limited emissions (lb/hr) / Unlimited PTE (lb/hr))

**Appendix A: Emission Calculations
Dacrotizing Metal Treatment (DSM)**

Company Name: Indiana Automotive Fasteners, Inc.
Address City IN Zip: 1300 West Anderson Boulevard
Significant Permit Revision Number: 059-35923-00024
Reviewer: Mehul Sura
Date: 7/30/2015

Emission Unit	Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
EU-9	Magni B06J*	12.39	42.9%	0.0%	42.9%	0.0%	64.7%	0.000088	5600	11.83	5.32	5.32	8.22	2.62	62.87	11.47	0.31	98%
EU-9b	Magni B18*	9.34	53.8%	0.0%	53.8%	0.0%	37.1%	0.000088	5600	11.83	5.02	5.02	13.54	2.48	59.43	10.85	0.19	98%
Totals:														5.10	122.30	22.32	0.49	

Hazardous air pollutants (HAPs)

Emission Unit	Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Cumene		Naphthlene		Xylene	
					% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)
EU-9	Magni B06J*	12.39	0.000088	5600	0.001%	0.0003	2.11%	0.56	1.93%	0.52
EU-9b	Magni B18*	9.34	0.000088	5600	-	-	-	-	1.00%	0.20
Totals:						0.0003		0.56		0.72
Total HAPs:										1.28

Notes:

VOC and HAPs emissions are controlled with a thermal oxidizer with an assumed control efficiency of 95%.

PM=PM₁₀=PM_{2.5}

The calculations are based on with as-applied coating, which includes the the coatings mixed with thinners in the following ratios:

Magni B06J (80 gal) : SC-150 (5 gal)

Magni B18 (80 gal) : MPA (10 gal)

Methodology:

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

Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day

VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC

VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)

VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids

PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)

PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day

PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs

PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

PTE of HAP (ton/yr) = Weight % HAP * Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Dacrotizing Line (DS-1, DS-2, DS-3) - Dip Coating

Company Name: Indiana Automotive Fasteners, Inc.
Address City IN Zip: 1300 West Anderson Boulevard
Significant Permit Revision Number: 059-35923-00024
Reviewer: Mehul Sura
Date: 7/30/2015

Emission Unit	Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)
Line 1 (EU-42)	Geomet 720 Hybrid	11.69	64.3%	43.2%	21.1%	57.5%	12.7%	0.000027	30,000	19.44	2.47	5.81	19.42	2.00	48.02	8.76
Line 2 (EU-22)	Geomet 720 Hybrid	11.69	64.3%	43.2%	21.1%	57.5%	12.7%	0.000027	30,000	19.44	2.47	5.81	19.42	2.00	48.02	8.76
Line 3 (EU-38)	Geomet 720 Hybrid	11.69	64.3%	43.2%	21.1%	57.5%	12.7%	0.000027	30,000	19.44	2.47	5.81	19.42	2.00	48.02	8.76
dip coating operation (EU-56)	Geomet 720 Hybrid	12.69	64.3%	43.2%	21.1%	57.5%	12.7%	0.000027	30,000	19.44	2.68	6.31	21.08	2.17	52.13	9.51

Hazardous air pollutants (HAPs)

Emission Unit	Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Methanol	
					% Weight	PTE (ton/yr)
Line 1 (EU-42)	Geomet 720 Hybrid	11.69	0.000027	30000	4.00%	1.66
Line 2 (EU-22)	Geomet 720 Hybrid	11.69	0.000027	30000	4.00%	1.66
Line 3 (EU-38)	Geomet 720 Hybrid	11.69	0.000027	30000	4.00%	1.66
dip coating operation (EU-56)	Geomet 720 Hybrid	11.69	0.000027	30000	4.00%	1.66

Notes:

VOC and HAPs emissions are controlled with a thermal oxidizer with an assumed control efficiency of 95%.

These coating lines use dip coating. Therefore, there are no particulate emissions.

PM=PM₁₀=PM_{2.5}

Methodology:

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

Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day

VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC

VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)

VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids

PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)

PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day

PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs

PTE of HAP (ton/yr) = Weight % HAP * Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Compliance with 326 IAC 8-2-9 for DSM, DS-1, DS-2, and DS-3

Company Name: Indiana Automotive Fasteners, Inc.
Address City IN Zip: 1300 West Anderson Boulevard
Significant Permit Revision Number: 059-35923-00024
Reviewer: Mehul Sura
Date: 7/30/2015

Compliance with 326 IAC 8-2-9

Emission Unit	Material	Equivalent emission limit (lb VOC/gal coating solids)	VOC content (lb/gal coating solids)	Overall control efficiency
DSM (EU-9)	Magni B06J*	6.67	8.22	18.8%
DSM (EU-9)	Magni B18*	6.67	13.54	50.7%
Line 1 (EU-42)	Geomet 720 Hybrid	6.67	19.42	65.6%
Line 2 (EU-22)	Geomet 720 Hybrid	6.67	19.42	65.6%
Line 3 (EU-38)	Geomet 720 Hybrid	6.67	19.42	65.6%
dip coating operation (EU-56)	Geomet 720 Hybrid	6.67	21.08	68.3%

Note:

The minimum control efficiency of the thermal oxidizer shall be greater than or equal to 68.3%

Methodology:

Pursuant to 8-1-2(b)(1), the equivalent VOC emissions limit is 6.67 lb VOC/gal of coating solids, as applied, calculated using the equation:

$$E = \frac{L}{(1 - (L / D))}$$

Where: E = Equivalent emission limit in lb VOC/gal of coating solids, as applied
L = Emission limit from 326 IAC 8-2-9 (3.5 lb VOC/gal of coating less water)
D = Baseline solvent density of VOC in coating (7.36 lb VOC/gal of solvent)

Pursuant to 8-1-2(c), the overall efficiency of the thermal oxidizer is calculated using the equation: $O = (V - E) / V * 100$

$$O = \frac{(V - E)}{V} * 100$$

Where: O = Equivalent overall efficiency of the thermal oxidizer as a percentage
V = The weighted average VOC contents of all coatings in lb VOC/gal of coating solids, as applied
E = Equivalent emission limit = (6.67 lb VOC/gal of coating solids, as applied)

Appendix A: Emission Calculations
JC-06 Top Coating (EU-45)

Company Name: Indiana Automotive Fasteners, Inc.
Address City IN Zip: 1300 West Anderson Boulevard
Significant Permit Revision Number: 059-35923-00024
Reviewer: Mehul Sura
Date: 7/30/2015

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Plus JL	9.70	75.0%	69.9%	5.2%	81.2%	64.7%	0.000024	20,000	11.38	0.50	2.66	0.77	0.24	5.68	1.04	0.005	99.9%
Plus JL Black	9.40	75.0%	69.7%	5.3%	78.6%	37.1%	0.000024	20,000	11.38	0.50	2.32	1.34	0.24	5.67	1.03	0.005	99.9%
Worst Case:													0.24	5.68	1.04	0.005	

Notes:

Parts coated on this line will receive either Plus JL coating, or Plus JL Black coating, but never will they receive both coatings. Therefore, a Worst Case Scenario was calculated. Source supplied information of 90 milliliters of coating is used for each 1000 part load, equating to 0.023775 gallons per load. Each load is 1000 units, or 0.0000237 gallons per unit. Baskets containing parts to be coated will be cleaned using high-pressure washers using water only. There will be no solvents used in this process.

PM=PM₁₀=PM_{2.5}

Methodology:

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

Volume % Water = Weight % Water * Density (lb/gal) / Density of water (8.34 lb/gal)

Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day

VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC

VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)

VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids

PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)

PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day

PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs

PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Barrel Zinc Coating Lines (BZ-1, BZ-2, BZ-3, BZ-4)

Company Name: Indiana Automotive Fasteners, Inc.
Address City IN Zip: 1300 West Anderson Boulevard
Significant Permit Revision Number: 059-35923-00024
Reviewer: Mehul Sura
Date: 7/30/2015

Line	Emission Unit	Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	Actual usage (gal/yr)	Actual hrs used (hrs/yr)	Maximum usage (gal/hr)	Percent Recovered	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
BZ-1	EU-12	Ekolasid 455 Brightener	9.26	10.0%	0.0%	10.0%	0.0%	90.0%	440.0	6,000	0.07	90%	0.93	0.93	1.03	0.007	0.163	0.030	-	100%
		Zinc P-1119	10.10	85.0%	0.0%	85.0%	0.0%	15.0%	2.0	6,000	0.0003	90%	8.59	8.59	57.23	0.0003	0.007	0.001	-	100%
BZ-2	EU-26	Ekolasid 455 Brightener	9.26	10.0%	0.0%	10.0%	0.0%	90.0%	440.0	6,000	0.07	90%	0.93	0.93	1.03	0.007	0.163	0.030	-	100%
		Zinc P-1119	10.10	85.0%	0.0%	85.0%	0.0%	15.0%	2.0	6,000	0.00	90%	8.59	8.59	57.23	0.0003	0.007	0.001	-	100%
BZ-4	EU-50	Ekolasid 455 Brightener	9.26	10.0%	0.0%	10.0%	0.0%	90.0%	440.0	6,000	0.07	90%	0.93	0.93	1.03	0.007	0.163	0.030	-	100%
		Zinc P-1119	10.10	85.0%	0.0%	85.0%	0.0%	15.0%	2.0	6,000	0.00	90%	8.59	8.59	57.23	0.0003	0.007	0.001	-	100%
Total:																0.02	0.51	0.09		

Notes:

No VOC containing materials are used on BZ-3 Line

PM=PM₁₀=PM_{2.5}**Methodology:**

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

Maximum usage (gal/hr) = Actual usage (gal/yr) / Actual hrs used (hrs/yr)

VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC

VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)

VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids

PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Maximum usage (gal/hr) * (1-Percent Recovery)

PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day

PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Hydrochloric acid (HCl) (for each line)

Process	Material	Density (lb/gal)	Maximum usage (gal/hr)	Weight % HCl	PTE of HCl (ton/yr)
#1 Acid treatment	HCL (30%)	9.68	0.17	9.67%	0.697
Acid electrolysis	HCL (30%)	9.68	0.13	9.67%	0.533
#1 Acid treatment	HCL (30%)	9.68	0.08	9.67%	0.328
Total:					1.558

Notes:

31.5% HCl is diluted by IAF to yield a solution that is 9.67% strength, by weight

Each BZ line has emissions controlled by a fiber-bed mist eliminator scrubber with a minimum 95% control efficiency

Metal HAPs are particulate in nature and can be controlled using a control device.

Methodology:

PTE of HCl (ton/yr) = Weight % HCl * Maximum usage (gal/hr) * Density (lb/gal) * 8760 hrs/yr * 1 ton/2000 lbs

PTE of Cr (ton/yr) = Weight % Cr * Usage rate (gal/lb of material) * Maximum throughput (lb of material/hr) * Density (lb/gal) * 8760 hrs/yr * 1 ton/2000 lbs

Chromium III (Cr) (for each line)

Process	Material	Density (lb/gal)	Usage rate (gal/lb of material)	Maximum throughput (lb material/hr)	Weight % Cr	PTE of Cr (ton/yr)
Chromium passivation	Liquid Trivalent Passivate	9.68	0.00031	3023.51	1.00%	0.393

**Appendix A: Emission Calculations
Barrel Zinc Coating Lines (BZ-5)**

Company Name: Indiana Automotive Fasteners, Inc.
Address City IN Zip: 1300 West Anderson Boulevard
Significant Permit Revision Number: 059-35923-00024
Reviewer: Mehul Sura
Date: 7/30/2015

Line	Emission Unit	Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	Actual usage (gal/yr)	Actual hrs used (hrs/yr)	Maximum usage (gal/hr)	Percent Recovered	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
BZ-5	EU-54	Ekolasid 455 Brightener	9.26	10.0%	0.0%	10.0%	0.0%	90.0%	440.0	6,000	0.07	90%	0.93	0.93	1.03	0.007	0.163	0.030	-	100%
		Zinc P-1119	10.10	85.0%	0.0%	85.0%	0.0%	15.0%	2.0	6,000	0.00	90%	8.59	8.59	57.23	0.0003	0.007	0.001	-	100%
		Total:															0.01	0.17	0.03	

Notes:
 No VOC containing materials are used on BZ-3 Line
 PM=PM₁₀=PM_{2.5}

Methodology:

Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water
 Maximum usage (gal/hr) = Actual usage (gal/yr) / Actual hrs used (hrs/yr)
 VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
 VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
 VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids
 PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Maximum usage (gal/hr) * (1-Percent Recovery)
 PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day
 PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Hydrochloric acid (HCl) (for each line)

Process	Material	Density (lb/gal)	Maximum usage (gal/hr)	Weight % HCl	PTE of HCl (ton/yr)
#1 Acid treatment	HCL (30%)	9.68	0.17	9.67%	0.697
Acid electrolysis	HCL (30%)	9.68	0.13	9.67%	0.533
#1 Acid treatment	HCL (30%)	9.68	0.08	9.67%	0.328
Total:					1.56

Notes:
 31.5% HCl is diluted by IAF to yield a solution that is 9.67% strength, by weight
 Each BZ line has emissions controlled by a fiber-bed mist eliminator scrubber with a minimum 95% control efficiency
 Metal HAPs are particulate in nature and can be controlled using a control device.

Methodology:

PTE of HCl (ton/yr) = Weight % HCl * Maximum usage (gal/hr) * Density (lb/gal) * 8760 hrs/yr * 1 ton/2000 lbs
 PTE of Cr (ton/yr) = Weight % Cr * Usage rate (gal/lb of material) * Maximum throughput (lb of material/hr) * Density (lb/gal) * 8760 hrs/yr * 1 ton/2000 lbs

Chromium III (Cr) (for each line)

Process	Material	Density (lb/gal)	Usage rate (gal/lb of material)	Maximum throughput (lb material/hr)	Weight % Cr	PTE of Cr (ton/yr)
Chromium passivation	Liquid Trivalent Passivate	9.68	0.00031	3023.5	1.00%	0.393

Appendix A: Emissions Calculations
Natural Gas Combustion

Company Name: Nucor Building Systems
Address City IN Zip: 305 Industrial Parkway, Waterloo, IN 46793
Significant Source Modification No: 033-34866-00035
Reviewer: Mehul Sura
Date: 7/30/2015

Existing natural gas-fired units

Emission unit	Emission Unit ID	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)
DSM dry-off oven	EU-7	0.3	2.6
DSM dacrotizing oven	EU-9a	1	8.6
DS1 pre-cure oven	EU-43	0.14	1.2
DS1 cure oven (6 burners @ 0.15 MMBtu)	EU-44	0.9	7.7
DS2 dry-off oven	EU-21	0.3	2.6
DS2 dry-off oven	EU-22b	0.7	6.0
DS3 pre-cure oven	EU-39	0.14	1.2
DS3 cure oven (6 burners @ 0.16 MMBtu)	EU-40	0.96	8.2
JC-06 pre-cure oven	EU-46	0.14	1.2
JC-06 cure oven (6 burners @ 0.15 MMBtu)	EU-47	5.4	46.4
Thermal oxidizer	EU-48	1.7	14.6
JC-03	EU-23	0.16	1.4
QQ1 CO ₂ generator and flame curtain	EU-3	0.79	6.8
QQ2 CO ₂ generator, flame curtain, furnace	EU-25	0.95	8.2
QQ3 CO ₂ generator, flame curtain, furnace	EU-29	0.95	8.2
QQ4 CO ₂ generator, flame curtain, furnace	EU-31	0.95	8.2
QQ5 CO ₂ generator, flame curtain, furnace	EU-33	0.95	8.2
QQ6 CO ₂ generator, flame curtain, furnace	EU-35	0.95	8.2
LOQ1 furnaces	EU-34	1.72	14.8
LOQ2 CO ₂ generator and flame curtain	EU-51	0.79	6.8
Boiler	EU-15	2.1	18.0
Boiler	EU-15-1	1.977	17.0
Boiler	EU-15-2	1.977	17.0
Boiler	EU-15-3	1.977	17.0
Boiler	EU-16	1.2	10.3
Boiler	EU-15-4	1.977	17.3
Flame curtain	EU-55	0.01	0.1
Tempering oven	EU-55	0.16	1.4
CO ₂ generator	EU-55	0.78	6.8
Annealing oven (LAN#1)	EU-16	1.11	9.5
Totals:		33.16	285.3

new natural gas-fired units (new ovens EU-57 and EU-58) and modified ovens (EU-7, EU-44 and EU-22b)

Emission unit	total Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)
pre-cure oven at EU-57	0.2	1.7
pre-cure oven at EU-58	0.16	1.4
dry-off oven (DSM) at EU-7	1.8	15.5
six (6) burners at EU-44	0.9	7.7
eleven (11) burners at EU-22b	8.4	72.1
Totals:	11.46	98.42

Unit ID	Heat Input Capacity (MMBtu/hr)	HHV (mmBtu/mmcf)	Potential Throughput (MMCF/yr)
Existing natural gas-fired units	33.16	1020	284.8
new natural gas-fired units (new ovens EU-57 and EU-58) and modified ovens (EU-7, EU-44 and EU-22b)	11.46	1020	98.4

	Pollutant (tons/yr)						
	PM*	PM10*	direct PM2.5*	SO ₂	NO _x	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **	5.5	84
Emission Rate in lb/MMBtu	0.0019	0.0075	0.0075	0.0006	0.0980	0.0054	0.0824
Existing natural gas-fired units	0.271	1.08	1.08	0.09	14.24	0.78	11.96
new natural gas-fired units (new ovens EU-57 and EU-58) and modified ovens (EU-7, EU-44 and EU-22b)	0.094	0.37	0.37	0.03	4.92	0.27	4.13
Total	0.364	1.456	1.456	0.115	19.160	1.054	16.094

*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 Rate in lb/MMBtu = Emission Factor (lb/MMCF) / 1020 (MMBtu/MMCF)

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 - Organics (tons/yr)					HAPs - Metals (tons/yr)				
	Benzene	Dichlorobenzen e	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	0.002	0.001	0.075	1.800	0.003	0.001	0.001	0.001	0.000	0.002
Existing natural gas-fired units	3.0E-04	1.7E-04	1.1E-02	2.6E-01	4.8E-04	7.1E-05	1.6E-04	2.0E-04	5.4E-05	3.0E-04
new natural gas-fired units (new ovens EU-57 and EU-58) and modified ovens (EU-7, EU-44 and EU-22b)	1.0E-04	5.9E-05	3.7E-03	8.9E-02	1.7E-04	2.5E-05	5.4E-05	6.9E-05	1.9E-05	1.0E-04
Total	0.00040	0.000	0.014	0.345	0.001	0.00010	0.00021	0.00027	0.00007	0.00040

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.

0.36



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

August 19, 2015

Mr. Gary Berling
Indiana Automotive Fasteners, Inc.
1300 West Anderson Boulevard
Greenfield, Indiana 46140

Re: Public Notice
Indiana Automotive Fasteners, Inc.
Permit Level: FESOP-Significant Permit Revision
(Minor PSD)
Permit Number: 059-35923-00024

Dear Mr. Berling:

Enclosed is a copy of your draft FESOP-Significant Permit Revision (Minor PSD), Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Daily Reporter in Greenfield, publish the abbreviated version of the public notice no later than August 21, 2015. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Hancock County Public Library, 900 West McKenzie Road in Greenfield, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Mehul Sura, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-6868 or dial (317) 233-6868.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover letter-2014. Dot4/10/14



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 19, 2015

Daily Reporter
22 West New Road
Greenfield, Indiana 46140

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Indiana Automotive Fasteners, Inc., Hancock County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 21, 2015.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: FESOP-Significant Permit Revision (Minor PSD).
Permit Number: 059-35923-00024

Enclosure

PN Newspaper.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 19, 2015

To: Hancock County Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Indiana Automotive Fasteners, Inc.
Permit Number: 059-35923-00024

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
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Notice of Public Comment

August 19, 2015

Indiana Automotive Fasteners, Inc.

059-35923-00024

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.


Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
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Mail Code 61-53

IDEM Staff	VBIDDLE 8/19/2015 Indiana Automotive Fasteners, Inc. 059-35923-00024 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Gary Berling Indiana Automotive Fasteners, Inc. 1300 W Anderson Blvd Greenfield IN 46140 (Source CAATS)									
2		Hancock County Commissioners 111 American Legion #219 Greenfield IN 46140 (Local Official)									
3		Hancock County Public Library 900 West McKenzie Greenfield IN 46140-1741 (Library)									
4		Hancock County Health Department 111 America Legion Greenfield IN 46140-2365 (Health Department)									
5		Greenfield City Council and Mayors Office 10 S. State St. Greenfield IN 46140 (Local Official)									
6		Timothy Scroggins 3171 W 1000 N Fortville IN 46040 (Affected Party)									
7		Robert Downey Alpine Environmental, Inc 1715 West Foxcliff Drive South Martinsville IN 46151 (Consultant)									
8		Keihin North America, Inc. 400 West New Road Greenfield IN 46140 (Affected Party)									
9		Indiana Box 2200 Royal Drive Greenfield IN 46140 (Affected Party)									
10		Hancock Wellness Center 888 West New Road Greenfield IN 46140 (Affected Party)									
11		MPI Release Technologies 2162 North Hastings Boulevard Greenfield IN 46140 (Affected Party)									
12		T/C Land LLC 2274 North Fortville Pike Greenfield IN 46140 (Affected Party)									
13		Tracy Stoops 1135 West New Road Greenfield IN 46140 (Affected Party)									
14											
15											

Total number of pieces Listed by Sender 13	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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