



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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Minor Source Operating Permit (MSOP)

for NTK Precision Axle Corporation in Clinton County

Significant Permit Revision No. 023-36448-00038

The Indiana Department of Environmental Management (IDEM) has received an application from NTK Precision Axle Corporation, located at 741 South County Road 200 West, Frankfort, IN 46041, for a significant revision of its MSOP issued on March 25, 2009. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow NTK Precision Axle Corporation to make certain changes at its existing source. NTK Precision Axle Corporation has applied to expand its existing metal hub ring turning facilities and induction heat treatment facility and the construct and operate new cold cleaner tanks.

The applicant intends to modify existing equipment and 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. 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.

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

Frankfort Community Public Library
208 West Clinton St.
Frankfort, IN 46041

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 SPR 023-36448-00038 in all correspondence.

Comments should be sent to:

Brian Wright
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-6544
Or dial directly: (317) 234-6544
Fax: (317) 232-6749 attn: Brian Wright
E-mail: Bwright1@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 Brian Wright of my staff at the above address.



Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality



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DRAFT

Terry Jacot
NTK Precision Axle Corporation
741 South County Road 200 West
Frankfort, IN 46041

Re: 023-36448-00038
Significant Revision to
M023-27165-00038

Dear Terry Jacot:

NTK Precision Axle Corporation was issued a Minor Source Operating Permit (MSOP) Renewal No. M023-27165-00038 on March 25, 2009 for a stationary automotive components manufacturing plant located at 741 South County Road 200 West, Frankfort, IN 46041. On November 2, 2015, the Office of Air Quality (OAQ) received an application from the source requesting the expansion of its existing metal hub ring turning facilities and induction heat treatment facility and the construction and operation of new cold cleaner tanks. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, 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 2-6.1-6, 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 MSOP as revised.

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 Brian Wright of my staff at 317-234-6544 or 1-800-451-6027, and ask for extension 4-6544.

Sincerely,

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

NB/BW

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



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

**NTK Precision Axle Corporation
741 South County Road 200 West
Frankfort, Indiana 46041**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No. M023-27165-00038	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 25, 2009 Expiration Date: March 25, 2019

Notice-Only Change No.: 023-30340-00038, issued on April 29, 2011.

Significant Permit Revision No. 023-36448-00038	
Issued by: Nathan Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: March 25, 2019

DRAFT

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary automotive components manufacturing plant.

Source Address:	741 South County Road 200 West, Frankfort, IN 46041
General Source Phone Number:	(765) 656-1026
SIC Code:	3714
County Location:	Clinton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Metal Hub ring manufacturing operations consisting of:
- (1) Two (2) metal hub ring turning facilities (identified as EU-01 and EU-03), constructed in 2005, modified in 2011, approved in 2016 for modification, consisting of 406 lubricant application stations, with particulates controlled via wet turning, using a maximum of 47,576 gallons of VOC-containing coating material per year.
 - (2) One (1) induction heat treatment facility (identified as EU-02), approved in 2016 for modification, using a maximum of 15,998 gallons of VOC-containing coating material per year, and exhausting to Stacks EP-01 through 18, and EP-35 through EP-52.
 - (3) One (1) broaching facility (identified as EU-04), approved in 2016 for modification, with particulates controlled via wet broaching, using a maximum of 7,920 gallons of non-VOC-containing coating material per year.
 - (4) One (1) rust proofing facility (identified as EU-05), approved in 2016 for modification, using a maximum of 21,562 gallons of VOC-containing coating material per year.
- (b) Metal Shaft manufacturing operations consisting of:
- (1) One (1) sawing facility (identified as EU-06), approved in 2016 for modification, with particulates controlled via wet sawing, using a maximum of 554 gallons per year.
 - (2) One (1) CVJ shaft turning and spline facility (identified as EU-07), approved in 2016 for modification, with particulates controlled via wet turning, using a maximum of 6,795 gallons of coating material per year.

- (3) One (1) induction heat treatment facility (identified as EU-08), with a maximum throughput rate of 3,960 gallons of non-VOC containing material per year.
- (4) One (1) Parkerizing facility (identified as EU-09), approved in 2016 for modification, with a maximum throughput rate of 5,796 gallons rust-retardant coating per year, and exhausting at stacks EP-29 and 30.
- (5) One (1) electrodeposition coating line (identified as EU-10), approved in 2016 for modification, with a maximum throughput rate of 3,010 gallons of VOC-containing coating per year and 2,486 gallons of non-VOC material per year, and exhausting at stacks EP31 through 33.
- (c) Five (5) cold cleaner tanks (identified as EU-13), each with a storage capacity of 78 gallons and maximum solvent consumption of 0.5 gallons per day. These units are used for facility maintenance purposes.
- (d) One (1) degreaser tank used in conjunction with the Parkerizing facility, with a storage capacity of 78 gallons and maximum consumption of 1.39 gallons of non-VOC containing material per hour.
- (e) One (1) natural gas-fired boiler (identified as EU-11), with a maximum heat input capacity of 11.0 MMBtu per hour and exhausting at Stack EP-34.
- (f) Natural gas-fired combustion units (identified as EU-12), with a total maximum heat input capacity of 1.67 MMBtu per hour.
- (g) One (1) wastewater treatment facility (identified as EU-14).
- (h) Paved roads.

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, M023-27165-00038, 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

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M023-27165-00038 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Production Lines

- (a) Metal Hub ring manufacturing operations consisting of:
- (1) Two (2) metal hub ring turning facilities (identified as EU-01 and EU-03), constructed in 2005, modified in 2011, approved in 2016 for modification, consisting of 406 lubricant application stations, with particulates controlled via wet turning, using a maximum of 47,576 gallons of VOC-containing coating material per year.
 - (2) One (1) induction heat treatment facility (identified as EU-02), approved in 2016 for modification, using a maximum of 15,998 gallons of VOC-containing coating material per year, and exhausting to Stacks EP-01 through 18, and EP-35 through EP-52.
 - (3) One (1) broaching facility (identified as EU-04), approved in 2016 for modification, with particulates controlled via wet broaching, using a maximum of 7,920 gallons of non-VOC-containing coating material per year.
 - (4) One (1) rust proofing facility (identified as EU-05), approved in 2016 for modification, using a maximum of 21,562 gallons of VOC-containing coating material per year.
- (b) Metal Shaft manufacturing operations consisting of:
- (1) One (1) sawing facility (identified as EU-06), approved in 2016 for modification, with particulates controlled via wet sawing, using a maximum of 554 gallons per year.
 - (2) One (1) CVJ shaft turning and spline facility (identified as EU-07), approved in 2016 for modification, with particulates controlled via wet turning, using a maximum of 6,795 gallons of coating material per year.
 - (3) One (1) induction heat treatment facility (identified as EU-08), with a maximum throughput rate of 3,960 gallons of non-VOC containing material per year.
 - (4) One (1) Parkerizing facility (identified as EU-09), approved in 2016 for modification, with a maximum throughput rate of 5,796 gallons rust-retardant coating per year, and exhausting at stacks EP-29 and 30.
 - (5) One (1) electrodeposition coating line (identified as EU-10), approved in 2016 for modification, with a maximum throughput rate of 3,010 gallons of VOC-containing coating per year and 2,486 gallons of non-VOC material per year, and exhausting at stacks EP31 through 33.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

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 of VOC per gallon of coating, excluding water, as delivered to the applicator, for extreme performance coatings. Therefore, the surface coating lines at this source shall each be limited to three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.1.2 VOC Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), for the surface coating operations performed by the hub ring turning (EU-01, EU-03), broaching (EU-04), induction heat treatment (EU-02), rust proofing (EU-05), sawing (EU-06), CVJ Shaft turning (EU-07), electrodeposition coating (EU-10), and Parkerizing (EU-09), 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 limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) 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.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) 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 Requirements

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC input and content limits contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

In order to comply with Condition D.1.1, surface coating operations performed by the hub ring turning (EU-01, EU-03), broaching (EU-04), induction heat treatment (EU-02), rust proofing (EU-05), sawing (EU-06), CVJ Shaft turning (EU-07), electrodeposition coating (EU-10), and Parkerizing (EU-09) operations shall use either compliant coatings or, when non-compliant coatings are used, the daily volume-weighted average VOC content.

When non-compliant coatings are used, the daily volume-weighted average VOC content shall be calculated pursuant to 326 IAC 8-1-2(a)(7), using the following equation:

Where:

$$A = \left(\sum C \times U \right) / \left(\sum U \right)$$

A = Volume weighted average (pounds VOC/gallon, less water as applied);

C = VOC content of the coating (pounds VOC/gallon, less water as applied); and

U = Usage rate of the coating (gallons/day).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1 when using compliant coatings, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.
- (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, calculations, 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;
- (b) To document the compliance status with Condition D.1.1 when using non-compliant coatings, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a daily 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 volume weighted average VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each day; and
 - (5) The total VOC usage for each day.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Cold Cleaners

- (c) Two (2) cold cleaner tanks (identified as EU-13), each with a storage capacity of 78 gallons and maximum solvent consumption of 0.50 gallons per day. These units are used for facility maintenance purposes.

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

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

D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

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

- (a) Operators of cold cleaner degreasers shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Operators of cold cleaner degreasers with a remote reservoir shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

Record Keeping and Reporting Requirement [326 IAC 2-6.1-5(a)(2)]

D.2.3 Record Keeping Requirements

To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

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

Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Boiler

- (e) One (1) natural gas-fired boiler (identified as EU-11), with a maximum heat input capacity of 1.67 MMBtu per hour and exhausting at Stack EP-34.

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

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

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (a) (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 1.67 MMBtu per hour natural gas-fired boiler (identified as EU-11) shall not exceed 0.60 pounds of particulate matter per million British thermal units heat input (lbs per MMBtu heat input).

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Technical Support Document (TSD) for a Significant Permit Revision to a
Minor Source Operating Permit (MSOP) Renewal

Source Description and Location

Source Name: NTK Precision Axle Corporation
741 County Road, 200 West, Frankfort, Indiana 46401

County: Clinton

SIC Code: 3714 (Motor Vehicle Parts and Accessories)

Operation Permit No.: M023-27165-00038

Operation Permit Issuance Date: March 25, 2009

Significant Permit Revision No.: 023-36448-00038

Permit Reviewer: Brian Wright

On November 2, 2015, the Office of Air Quality (OAQ) received an application from NTK Precision Axle Corporation related to a modification to an existing stationary automotive components manufacturing plant.

Existing Approvals

The source was issued MSOP Renewal No. M023-27165-00038 on March 25, 2009. The source has since received the following approvals:

- (a) Notice-Only Change No. 023-30340-00038, issued on April 29, 2011.

County Attainment Status

The source is located in Clinton 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.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Clinton 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}**
 Clinton County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Clinton County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Status of the Existing Source

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

This PTE table is from the TSD Appendix A of 023-30340-00038, issued on April 29, 2011. The PTE calculations for the fugitive emissions (paved roads) have been updated as part of this revision, but no changes to the paved roads have occurred at the source.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Production Lines (EU01-EU07, EU09-EU10)	-	-	-	-	-	28.89	-	0.15	0.15 Glycol ether
Cold Cleaners (EU-13)	-	-	-	-	-	1.86	-	-	-
Combustion Units (EU 11 and EU 12)	0.10	0.41	0.41	0.03	5.44	0.30	4.57	0.10	0.10 Hexane
Total PTE of Entire Source Excluding Fugitives	0.10	0.41	0.41	0.03	5.44	31.05	4.57	0.26	0.15 Glycol ether
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Fugitive Emissions (Paved Roads)	2.62	0.52	0.13	-	-	-	-	-	-
Total PTE of Entire Source Including Fugitives	2.72	0.94	0.54	0.03	5.44	31.05	4.57	0.26	0.15 Glycol ether
MSOP Threshold	25	25	25	25	25	25	-	-	-

* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by NTK Precision Axle Corporation on November 2, 2015, relating to the expansion of its existing metal hub ring turning facilities and induction heat treatment facility and the construction and operation of new cold cleaner tanks.

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

- (a) Two (2) metal hub ring turning facilities (identified as EU-01 and EU-03), constructed in 2005, modified in 2011, approved in 2016 for modification, consisting of 406 lubricant application stations, with particulates controlled via wet turning, using a maximum of 47,576 gallons of VOC-containing coating material per year.
- (b) One (1) induction heat treatment facility (identified as EU-02), approved in 2016 for modification, using a maximum of 15,998 gallons of VOC-containing coating material per year, and exhausting to Stacks EP-01 through 18, and EP-35 through EP-53.
- (c) One (1) rust proofing facility (identified as EU-05), approved in 2016 for modification, using a maximum of 21,562 gallons of VOC-containing coating material per year.
- (d) One (1) sawing facility (identified as EU-06), approved in 2016 for modification, with particulates controlled via wet sawing, using a maximum of 554 gallons per year.
- (e) One (1) CVJ shaft turning and spline facility (identified as EU-07), approved in 2016 for modification, with particulates controlled via wet turning, using a maximum of 6,795 gallons of coating material per year.
- (f) One (1) Parkerizing facility (identified as EU-09), approved in 2016 for modification, with a maximum throughput rate of 5,796 gallons rust-retardant coating per year, and exhausting at stacks EP-29 and 30.
- (g) One (1) electrodeposition coating line (identified as EU-10), approved in 2016 for modification, with a maximum throughput rate of 3,010 gallons of VOC-containing coating per year and 2,486 of non-VOC material, and exhausting at stacks EP31 through 33.
- (h) Three (3) cold cleaner tanks (identified as EU-13), each with a storage capacity of 78 gallons and maximum solvent consumption of 0.5 gallons per day. These units are used for facility maintenance purposes.

Note: The composition of the coatings used by the existing units has been changed. As a result the PTE of VOC and HAPs of existing units has changed.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

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

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Change in PTE of New and Modified Emission Units									
Production Lines (EU01-EU07, EU09-EU10)	-	-	-	-	-	43.19	-	-	-
Cold Cleaners	-	-	-	-	-	1.95	-	-	-
Total PTE of Proposed Revision	-	-	-	-	-	45.14	-	-	-

- Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through a Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit Revision and the proposed revision involves the modification of existing emission units with a potential to emit greater than or equal to twenty-five (25) tons per year of VOC.

PTE of the Entire Source After Issuance of the MSOP Revision or Amendment

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

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Production Lines (EU01-EU07, EU09-EU10)	-	-	-	-	-	28.89 72.08	-	0.15 -	0.15 Glycol ether -
Cold Cleaners (EU-13)	-	-	-	-	-	4.86 3.26	-	-	-
Combustion Units (EU 11 and EU 12)	0.10	0.41	0.41	0.03	5.44	0.30	4.57	0.10	0.10 Hexane
Total PTE of Entire Source Excluding Fugitives	0.10	0.41	0.41	0.03	5.44	31.05 75.64	4.57	0.26 0.10	0.15 Glycol ether 0.10 Hexane
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Fugitive Emissions (Paved Roads)	2.62	0.52	0.13	-	-	-	-	-	-
Total PTE of Entire Source Including Fugitives	2.72	0.94	0.54	0.03	5.44	31.05 75.64	4.57	0.26 0.10	0.15 Glycol ether 0.10 Hexane
MSOP Threshold	25	25	25	25	25	25	-	-	-

* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source after issuance of this revision. The table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision or Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Production Lines (EU01-EU07, EU09-EU10)	-	-	-	-	-	72.08	-	-	-

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision or Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Cold Cleaners (EU-13)	-	-	-	-	-	6.52	-	-	-
Combustion Units (EU 11 and EU 12)	0.10	0.41	0.41	0.03	5.44	0.30	4.57	0.10	0.10 Hexane
Total PTE of Entire Source Excluding Fugitives	0.10	0.41	0.41	0.03	5.44	75.64	4.57	0.10	0.10 Hexane
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Fugitive Emissions (Paved Roads)	2.62	0.52	0.13	-	-	-	-	-	-
Total PTE of Entire Source Including Fugitives	2.72	0.94	0.54	0.03	5.44	75.64	4.57	0.10	0.10 Hexane
MSOP Threshold	25	25	25	25	25	25	-	-	-
* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} .									

MSOP Status

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

- (2) **HAPs**
 This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Permit Level Determination – PSD or Emission Offset or Nonattainment NSR

- (a) **PSD Minor Source – PM**
 This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

- (b) **PSD Minor Source – Other Regulated Pollutants**
 This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above or Appendix A.

Federal Rule Applicability Determination

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

- (b) National Emission Standards for Hazardous Air Pollutants (NESHAP)
- (1) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-6-1), are not included in the permit, since this source is not a major source of HAPs, and only non-halogenated solvents are used for these operations.
 - (2) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM, (326 IAC 20-80-1), are not included in the permit, this source is not a major source of HAP emissions and does not use 250 gallons (gal) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts & products.
 - (3) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, are not included in the permit, since the coatings used at this source are protective or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances and temporary protective coatings, lubricants, or surface preparation materials. These types of materials are specifically excluded from the requirements of this rule under 40 CFR 63.11180.
 - (4) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.
- (c) Compliance Assurance Monitoring (CAM)
Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new and modified 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.

See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (d) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (e) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Surface Coating

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(5), the surface coating operations performed by the hub ring turning (EU-01, EU-03) and induction heat treatment (EU-02) are not subject to the requirements of 326 IAC 6-3 since these operations apply coatings through dip coating.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Pursuant to 316 IAC 8-1-6(3), the surface coating operations performed by the hub ring turning (EU-01, EU-03) and induction heat treatment (EU-02) are not subject to the requirements of 326 IAC 8-1-6 since the operations are subject to the requirements of 326 IAC 8-2-9.
- (c) 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating)
Pursuant to 326 IAC 8-2-2(a), the surface coating operations performed by the hub ring turning (EU-01, EU-03) and induction heat treatment (EU-02) are not subject to the requirements of 326 IAC 8-2-2 since they are not automobile and light duty truck surface coating operations as defined by 326 IAC 8-2-2(a).
- (d) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coatings)
Pursuant to 326 IAC 8-2-1(a)(4), the surface coating operations performed by the hub ring turning (EU-01, EU-03) and induction heat treatment (EU-02) are subject to the requirements of 326 IAC 8-2-9 since it was constructed after July 1, 1990, has potential VOC emissions of greater than fifteen (15) pounds per day before add-on controls, and performs surface coating of metal parts as specified in 326 IAC 8-2-9(a) and (b). This source operates under the Standard Industrial Classification (SIC) Code 3714 (major group #37), which is listed under 326 IAC 8-2-9(a)(1)(E). The applicability of 326 IAC 8-2-9 is as follows:

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Permittee shall comply with the following requirements for the surface coating operations:

- (1) The Permittee shall not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of three and a half (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).

Based on the MSDS submitted by the source, the VOC content of the coatings used in surface coating operations are all less than 3.5 pounds of VOC per gallon of coating.

- (2) 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:
 - (A) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (B) 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.
 - (C) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (D) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

- (E) 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.

Cold Cleaner Tanks

- (a) 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements) Pursuant to 326 IAC 8-3-1(c), the cold cleaner tanks (EU-13) are subject to 326 IAC 8-3-2(a) and (b) since they are cold cleaner degreasers installed after 1990 and do not have remote solvent reservoirs. The Permittee shall:
 - (1) Operators of cold cleaner degreasers shall ensure the following control equipment and operating requirements are met:
 - (A) Equip the degreaser with a cover.
 - (B) Equip the degreaser with a device for draining cleaned parts.
 - (C) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (D) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (E) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (F) Store waste solvent only in closed containers.
 - (G) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
 - (2) Operators of cold cleaner degreasers without remote reservoirs shall ensure the following additional control equipment and operating requirements are met:
 - (A) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (ii) A water cover when solvent used is insoluble in, and heavier than, water.
 - (iii) A refrigerated chiller.
 - (iv) Carbon adsorption.
 - (v) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (B) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (C) If used, solvent spray:
 - (i) must be a solid, fluid stream; and
 - (ii) shall be applied at a pressure that does not cause excessive splashing.

- (b) 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)
Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (c) 326 IAC 8-17 (Industrial Solvent Cleaning Operations)
Pursuant to 326 IAC 8-17-1(a), the cold cleaner tanks (EU-13) are not subject to the requirements of 326 IAC 8-17 since the source is not located in Lake or Porter County.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP Renewal No: M023-27165-00038, issued on March 25, 2009 with its most recent revisions and amendments.

Proposed Changes

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

- (1) Section A.2 has been amended as follows in order to incorporate the revision. Section A.2 has also been amended to include paved roads, since these emission have always been included in the calculations and were specified in the original application for MSOP 023-18813-00038.

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Metal Hub ring manufacturing operations consisting of:
- (1) Two (2) metal hub ring turning facilities (identified as EU-01 and EU-03), constructed in 2005, ~~approved for modification~~ **modified** in 2011, **approved in 2016 for modification**, consisting of ~~multiple~~ **406** lubricant application stations, with particulates controlled via wet turning, using a maximum of ~~44,440~~ **47,576** gallons of VOC-containing coating material per year.
 - (2) One (1) induction heat treatment facility (identified as EU-02), **approved in 2016 for modification**, using a maximum of ~~4,026~~ **15,998** gallons of VOC-containing coating material per year, and exhausting to Stacks EP-01 through 18, and EP-35 through EP-53.
 - (3) One (1) broaching facility (identified as EU-04), **approved in 2016 for modification**, with particulates controlled via wet broaching, using a maximum of 7,920 gallons of non-VOC-containing coating material per year.
 - (4) One (1) rust proofing facility (identified as EU-05), **approved in 2016 for modification**, using a maximum of ~~8,326~~ **21,562** gallons of VOC-containing coating material per year.
- (b) Metal Shaft manufacturing operations consisting of:
- (1) One (1) sawing facility (identified as EU-06), **approved in 2016 for modification**, with particulates controlled via wet sawing, using a maximum of ~~220~~ **554** gallons per year.

- (2) One (1) CVJ shaft turning and spline facility (identified as EU-07), **approved in 2016 for modification**, with particulates controlled via wet turning, using a maximum of ~~4,760~~ **6,795** gallons of coating material per year.
 - (3) One (1) induction heat treatment facility (identified as EU-08), with a maximum throughput rate of 3,960 gallons of non-VOC containing material per year.
 - (4) One (1) Parkerizing facility (identified as EU-09), **approved in 2016 for modification**, with a maximum throughput rate of ~~126,979 pounds~~ **5,796 gallons** rust-retardant coating per year, and exhausting at stacks EP-29 and 30.
 - (5) One (1) electrodeposition coating line (identified as EU-10), **approved in 2016 for modification**, with a maximum throughput rate of ~~2,908~~ **3,010** gallons of **VOC-containing** coating per year **and 2,486 gallons of non-VOC material per year**, and exhausting at stacks EP31 through 33.
- (c) ~~Two (2)~~ **Five (5)** cold cleaner tanks (identified as EU-13), each with a storage capacity of 78 gallons and maximum solvent consumption of 0.50 gallons per day. These units are used for facility maintenance purposes.
- *****

(h) Paved roads.

- (2) Section D.2 has been amended as follows in order to incorporate the modification and to update the model language of 326 IAC 8-2-9:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Production Lines

- (a) Metal Hub ring manufacturing operations consisting of:
 - (1) Two (2) metal hub ring turning facilities (identified as EU-01 and EU-03), constructed in 2005, ~~approved for modification~~ **modified in 2011, approved in 2016 for modification**, consisting of ~~multiple~~ **406** lubricant application stations, with particulates controlled via wet turning, using a maximum of ~~44,440~~ **47,576** gallons of VOC-containing coating material per year.
 - (2) One (1) induction heat treatment facility (identified as EU-02), **approved in 2016 for modification**, using a maximum of ~~4,026~~ **15,998** gallons of VOC-containing coating material per year, and exhausting to Stacks EP-01 through 18, and EP-35 through EP-53.
 - (3) One (1) broaching facility (identified as EU-04), **approved in 2016 for modification**, with particulates controlled via wet broaching, using a maximum of 7,920 gallons of non-VOC-containing coating material per year.
 - (4) One (1) rust proofing facility (identified as EU-05), **approved in 2016 for modification**, using a maximum of ~~8,326~~ **21,562** gallons of VOC-containing coating material per year.
- (b) Metal Shaft manufacturing operations consisting of:
 - (1) One (1) sawing facility (identified as EU-06), **approved in 2016 for modification**, with particulates controlled via wet sawing, using a maximum of ~~220~~ **554** gallons per year.

- (2) One (1) CVJ shaft turning and spline facility (identified as EU-07), **approved in 2016 for modification**, with particulates controlled via wet turning, using a maximum of ~~4,760~~ **6,795** gallons of coating material per year.
 - (3) One (1) induction heat treatment facility (identified as EU-08), with a maximum throughput rate of 3,960 gallons of non-VOC containing material per year.
 - (4) One (1) Parkerizing facility (identified as EU-09), **approved in 2016 for modification**, with a maximum throughput rate of ~~426,979 pounds~~ **5,796 gallons** rust-retardant coating per year, and exhausting at stacks EP-29 and 30.
 - (5) One (1) electrodeposition coating line (identified as EU-10), **approved in 2016 for modification**, with a maximum throughput rate of ~~2,908~~ **3,010** gallons of **VOC-containing** coating per year and **2,486 gallons of non-VOC material per year**, and exhausting at stacks EP31 through 33.
- *****

D.1.2 VOC Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), for the surface coating operations performed by the hub ring turning (EU-01, EU-03), broaching (EU-04), induction heat treatment (EU-02), rust proofing (EU-05), sawing (EU-06), CVJ Shaft turning (EU-07), electrodeposition coating (EU-10), and Parkerizing (EU-09), 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 limited to, the following:

- (3) Section D.2 has been amended as follows in order to incorporate the revision of the units and most recent rule requirements of 326 IAC 8-3:

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

- Emissions Unit Description: Cold Cleaners
- (c) ~~Two (2)~~ **Five (5)** cold cleaner tanks (identified as EU-13), each with a storage capacity of 78 gallons and maximum solvent consumption of 0.50 gallons per day. These units are used for facility maintenance purposes.
- *****

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

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

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:~~

- ~~(a) Equip the cleaner with a cover;~~
- ~~(b) Equip the cleaner with a facility for draining cleaned parts;~~
- ~~(c) Close the degreaser cover whenever parts are not being handled in the cleaner;~~
- ~~(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~
- ~~(e) Provide a permanent, conspicuous label summarizing the operation requirements;~~

- ~~(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

~~D.2.2 VOC Clean-up Requirements [326 IAC 8-2-9]~~

- ~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:~~

- ~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~

~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~

~~(B) The solvent is agitated; or~~

~~(C) The solvent is heated.~~

- ~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~

- ~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~

- ~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~

- ~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):~~

~~(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~

~~(B) A water cover when solvent is used is insoluble in, and heavier than, water.~~

~~(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

- ~~(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:~~

- ~~_____ (1) _____ Close the cover whenever articles are not being handled in the degreaser.~~
- ~~_____ (2) _____ Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~
- ~~_____ (3) _____ Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]
Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall:

- (a) Operators of cold cleaner degreasers shall ensure the following control equipment and operating requirements are met:**
 - (1) Equip the degreaser with a cover.**
 - (2) Equip the degreaser with a device for draining cleaned parts.**
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.**
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;**
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).**
 - (6) Store waste solvent only in closed containers.**
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.**
- (b) Operators of cold cleaner degreasers with a remote reservoir shall ensure the following additional control equipment and operating requirements are met:**
 - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):**
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.**
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.**
 - (C) A refrigerated chiller.**
 - (D) Carbon adsorption.**
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.**
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.**
 - (3) If used, solvent spray:**

- (A) must be a solid, fluid stream; and
- (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

Record Keeping and Reporting Requirement [326 IAC 2-6.1-5(a)(2)]

D.2.3 Record Keeping Requirements

To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

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

Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

Additional Changes

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

- (1) IDEM has revised Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. **The analog instrument shall be capable of measuring values outside of the normal range.**

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 November 2, 2015.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 023-36448-00038. The staff recommends to the Commissioner that this MSOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright 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) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (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>.

**TSD Appendix A: Emissions Calculations
Emission Summary**

**Company Name: NTK Precision Axle Corporation
Source Address: 741 South County Road 200 West, Frankfort, Indiana 46401
MSOP SPR: 023-36448-00038
Reviewer: Brian Wright**

Potential to Emit of Entire Source (tons/year)										
Emission Units	PM	PM₁₀	PM_{2.5}	SO₂	NO_x	VOC	CO	Combined HAPs	Highest Single HAP	
Production Lines (EU01-EU07, EU09-EU10)	-	-	-	-	-	72.08	-	-	-	-
Cold Cleaners (EU-13)	-	-	-	-	-	3.26	-	-	-	-
Combustion Units (EU 11 and EU 12)	0.10	0.41	0.41	0.03	5.44	0.30	4.57	0.10	0.10	Hexane
Fugitive Emissions (Paved Roads)	2.62	0.52	0.13	-	-	-	-	-	-	-
TOTAL	2.72	0.94	0.54	0.03	5.44	75.64	4.57	0.10	0.10	Hexane

**TSD Appendix A: Emissions Calculations
Revision Summary**

**Company Name: NTK Precision Axle Corporation
Source Address: 741 South County Road 200 West, Frankfort, Indiana 46401
MSOP SPR: 023-36448-00038
Reviewer: Brian Wright**

		Potential to Emit (tons/year)							
Emission Units		PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Combined HAPs
Change in PTE from New and Modified Emission Units	Production Lines (EU01-EU07, EU09-EU10)	-	-	-	-	-	43.19	-	0.00
	Cold Cleaners	-	-	-	-	-	1.95	-	-
Total PTE of Revision							45.14		

**TSD Appendix A: Emissions Calculations
Production Lines VOC
Before Revision**

**Company Name: NTK Precision Axle Corporation
Source Address: 741 South County Road 200 West, Frankfort, Indiana 46401
MSOP SPR: 023-36448-00038
Reviewer: Brian Wright**

Operation	Emission Unit ID	Material Used	Density (lb/gal)	Max. Usage		Max. Usage (gal/hour)	Weight % VOC	PTE of VOC (lb/hour)	PTE of VOC (tons/yr)	Pounds VOC / gallon coating less water
				(gallons/yr)	(lbs/yr)					
Hub Ring Turning (New)	EU01, EU03	Waylube 68	8.31	1,135	9,432	0.13	0.0%	0.00	0.00	0.00
		Tech Cool 35410	8.58	1,820	15,616	0.21	12.40%	0.22	0.97	1.06
Hub Ring Turning (Existing)	EU01, EU03	Waylube 68	8.31	7,859	65,308	0.90	0.0%	0.00	0.00	0.00
		Tech Cool 35410	8.58	12,620	108,280	1.44	12.40%	1.53	6.71	1.06
Broaching	EU-04	Yeman NX-650Y	7.41	7,920	58,687	0.90	0.0%	0.00	0.00	0.00
Induction Heat Treatment	EU-02	GeoGuard 4017	10.2	150	1,530	0.02	0.0%	0.00	0.00	0.00
		Daphane Plastic Quench RP	7.16	4,026	28,826	0.46	13.00%	0.43	1.87	0.93
Rustproofing	EU-05	BioCorr	8.34	7,600	63,384	0.87	0.0%	0.00	0.00	0.00
		Anticorit SL 6941	7.19	8,326	59,864	0.95	35.6%	2.43	10.66	2.56
Sawing	EU-06	Yuman CM20	7.58	220	1,668	0.03	0.0%	0.00	0.00	0.00
CVJ Shaft Turning and Spline	EU-07	Yuman NX-650Y	7.41	1,760	13,042	0.20	0.0%	0.00	0.00	0.00
Parkerizing	EU-09	Parco Cleaner ZX-3	7.39	792	90,000	0.09	0.0%	0.00	0.0	0.00
		Fixodine M Treatment*	NA	N/A	4,000	NA	0.0%	0.00	N/A	N/A
		Parco Lubrite 2	10.4	3,168	32,979	0.36	0.0%	0.00	0.0	0.00
Electrodeposition Coating	EU-10	Powercron Resin	8.85	1,782	15,771	0.20	63.98%	1.15	5.05	5.66
		Powercron Black Paste	11.18	396	4,427	0.05	40.74%	0.21	0.90	4.55
		Chemfos 810 RW	12.51	264	3,303	0.03	58.59%	0.22	0.97	7.33
		Chemfos 810 AW	11.93	132	1,575	0.02	60.94%	0.11	0.48	7.27
		Chemfos Liquid Additive	10.91	4.0	44	0.0005	77.19%	0.00	0.02	8.42
		Gillite 0650 J	9.26	330	3,056	0.04	83.05%	0.29	1.27	7.69
TOTAL								28.89		

Note: There are no particulate emissions from the above operations.

*solid

Maximum Usages in **Bold** are the maximum capacities used in the description of the units.

METHODOLOGY

PTE of VOC (lbs/hour) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % VOC

PTE of VOC (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/yr) * Weight % VOC * 1 ton/2000 lbs

Pounds of VOC per gallon coating less Water (as applied) = Density (lb/gal) * Weight % Organics * 1 / (1-Volume % Water)

**TSD Appendix A: Emissions Calculations
Production Lines HAP
Before Revision**

**Company Name: NTK Precision Axle Corporation
Source Address: 741 South County Road 200 West, Frankfort, Indiana 46401
MSOP SPR: 023-36448-00038
Reviewer: Brian Wright**

Operation	Emission Unit ID	Material Used	Density (lb/gal)	Max. Usage		Max. Usage (gal/hour)	Weight % Glycol Ether	PTE of Glycol Ether (tons/year)
				(gallons/yr)	(lbs/yr)			
Electrodeposition Coating	EU-10	Powercron Resin	8.85	1,782	15,771	0.20	-	-
		Powercron Black Paste	11.18	396	4,427	0.05	-	-
		Chemfos 810 RW	12.51	264	3,303	0.03	-	-
		Chemfos 810 AW	11.93	132	1,575	0.02	-	-
		Chemfos Liquid Additive	10.91	4	44	0.00	-	-
		Gillite 0650 J	9.26	330	3,056	0.04	10.00%	0.15
TOTAL								0.15

The Materials used in the hub ring turning, broaching, induction heat treatment, rustproofing, sawing, CVJ shaft turning and spline operations do not contain any HAPs. The parkerizing process is a dip tank. The manganese and nickle are physically part of the coating solid and is released with the PM emissions. The transfer efficiency of the

METHODOLOGY

PTE of HAP (tons/year) = Denisty (lb/gal) * Max. Usage Rate (gal/yr) * Weight % HAP * 1 ton/2000 lbs

**TSD Appendix A: Emissions Calculations
Production Lines VOC
After Revision**

**Company Name: NTK Precision Axle Corporation
Source Address: 741 South County Road 200 West, Frankfort, Indiana 46401
MSOP SPR: 023-36448-00038
Reviewer: Brian Wright**

Operation	Emission Unit ID	Material Used	Density (lb/gal)	Max. Usage *		Max. Usage (gal/hour)	Weight % VOC	PTE of VOC (lb/hour)	PTE of VOC (lb/day)	PTE of VOC (tons/year)
				(gallons/yr)	(lbs/hr)					
Hub Ring Turning	EU01, EU03	Tech Cool 35410	8.76	47,576	-	5.43	12.4%	5.90	141.59	25.84
Broaching	EU-04	Yeman NX-650Y	7.42	4,372	-	0.50	0.00%	0.00	0.00	0.00
Induction Heat Treatment	EU-02	GeoGuard 4017	10.2	1,584	-	0.18	0.0%	0.00	0.00	0.00
		Daphane Plastic Quench RP	8.88	14,414	-	1.65	13.00%	1.90	45.59	8.32
Rustproofing	EU-05	BioCorr	8.34	5,676	-	0.65	0.0%	0.00	0.00	0.00
		Q-Koat	7.1	21,562	-	2.46	48.6%	8.49	203.80	37.19
Sawing	EU-06	Yuman CM20	7.58	554	-	0.06	0.0%	0.00	0.00	0.00
CVJ Shaft Turning and Splines	EU-07	Yuman NX-650Y	7.42	1,093	-	0.12	0.0%	0.00	0.00	0.00
		Geo-Guard 4008	8.58	1,346	-	0.15	0.00%	0.00	0.00	0.00
		SRI Oil	7.51	4,356	-	0.50	0.00%	0.00	0.00	0.00
Parkerizing	EU-09	Parco Cleaner ZX-3	10.93	1,505	-	0.00	0%	-	-	-
		Parco Lubrite 2	10.76	4,291	-	0.00	0%	-	-	-
Electrodeposition Coating	EU-10	Powercon Resin	8.85	2,455	-	0.28	3.39%	0.08	2.02	0.37
		Powercon Black Paste	11.3	554	-	0.06	11.50%	0.08	1.97	0.36
		Chemfos 810 RW	12.5	554	-	0.06	0.00%	0.00	0.00	0.00
		Chemfos 810 AW	11.9	475	-	0.05	0.00%	0.00	0.00	0.00
		Chemfos Liquid Additive	10.9	110	-	0.01	0.00%	0.00	0.00	0.00
		Gillite 0650 J	9.26	1,030	-	0.12	0.00%	0.00	0.00	0.00
		Chemfil Buffer	9.76	158	-		0.00%	0.00	0.00	0.00
Rinse Conditioner GL	8.33	158.40	-	0.02	0.0%	0.00	0.00	0.00		
TOTAL								16.46	394.97	72.1

Materials contain no HAPs

Note: There are no particulate emissions from the above operations.

METHODOLOGY

PTE of VOC (lbs/hour) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % VOC

PTE of VOC (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/yr) * Weight % VOC * 1 ton/2000 lbs

**TSD Appendix A: Emissions Calculations
Cold Cleaners**

Company Name: NTK Precision Axle Corporation
Source Address: 741 South County Road 200 West, Frankfort, Indiana 46401
MSOP SPR: 023-36448-00038
Reviewer: Brian Wright

Emission Unit ID	Material	Density (lb/gal)	Solvent Consumption (gal/day)	PTE of VOC (tons/year)
(2 Units total) EU-13	Aquatene GM 330	6.80	0.50	0.62
	Aquatene GM 330	6.80	0.50	0.62
(1 Units total) EU-13	Q-Koat	7.10	0.50	0.65
(2 Units total) EU-13	Glycol Ether EB	7.51	0.50	0.69
	Glycol Ether EB	7.51	0.50	0.69
Total				3.26

METHODOLOGY

PTE of HAP (tons/year) = Density (lb/gal) * Solvent Consumption (gal/day) * 1 day/24 hours * 8760 hours/year * 1 ton/2000 lbs * 3 units

**TSD Appendix A: Emission Calculations
Natural Gas Combustion Only
Boiler (EU 11) and Comfort Units (Identified as EU 12)**

Company Name: NTK Precision Axle Corporation
Source Address: 741 South County Road 200 West, Frankfort, Indiana 46401
MSOP SPR: 023-36448-00038
Reviewer: Brian Wright

Heat Input Capacity
MMBtu/hr

12.67

Potential Throughput
MMCF/yr

109

Pollutant

	PM*	PM10*	PM2.5*	SO2	NO _x	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.10	0.41	0.41	0.03	5.44	0.30	4.57

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

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

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMCF	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.1E-04	6.5E-05	4.1E-03	9.8E-02	1.8E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMCF	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.7E-05	6.0E-05	7.6E-05	2.1E-05	1.1E-04

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP-42, Chapter 1.4, Natural Gas Combustion, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

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

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

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

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

**Company Name: NTK Precision Axle Corporation
Source Address: 741 South County Road 200 West, Frankfort, Indiana 46401
MSOP SPR: 023-36448-00038
Reviewer: Brian Wright**

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	165.0	1.0	165.0	2.5	412.5	1350	0.256	42.2	15398.4
Vehicle (leaving plant) (one-way trip)	165.0	1.0	165.0	2.5	412.5	1350	0.256	42.2	15398.4
Totals			330.0		825.0			84.4	30796.9

Average Vehicle Weight Per Trip =

2.5	tons/trip
-----	-----------

Average Miles Per Trip =

0.26	miles/trip
------	------------

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	2.5	2.5	2.5	tons = average vehicle weight (provided by source)
sL =	8	8	8	g/m ³ = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $E_f * [1 - (p/4N)]$
where p =

125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
-----	---

N =

365	days per year
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	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.186	0.037	0.0091	lb/mile
Mitigated Emission Factor, Eext =	0.170	0.034	0.0083	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	1.43	0.29	0.07	1.31	0.26	0.06
Vehicle (leaving plant) (one-way trip)	1.43	0.29	0.07	1.31	0.26	0.06
Totals	2.86	0.57	0.14	2.62	0.52	0.13

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit



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

Carol S. Comer
Commissioner

December 29, 2015

Mr. Terry Jacot
NTK Precision Axle Corporation
741 South County Road 200 West
Frankfort, Indiana 46041

Re: Public Notice
NTK Precision Axle Corporation
Permit Level: MSOP-Significant Permit Revision
Permit Number: 023-36448-00038

Dear Mr. Jacot:

Enclosed is a copy of your draft MSOP-Significant Permit Revision, 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 Times in Frankfort, Indiana publish the abbreviated version of the public notice no later than December 31, 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 Frankfort Community Public Library, 208 West Clinton Street in Frankfort, 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 Brian Wright, 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 4-6544 or dial (317) 234-6544.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 8/27/2015



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

December 29, 2015

The Times
251 East Clinton Street
Frankfort, Indiana 46041

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for NTK Precision Axle Corporation, Clinton 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 December 31, 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: MSOP – Significant Permit Revision
Permit Number: 023-36448-00038

Enclosure

PN Newspaper.dot 8/27/2015



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

December 29, 2015

To: Frankfort Community 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: NTK Precision Axle Corporation
Permit Number: 023-36448-00038

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
PN Library.dot 8/27/2015



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

December 29, 2015
NTK Precision Axle Corporation
023-36448-00038

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
PN AAA Cover.dot 8/27/2015

Mail Code 61-53

IDEM Staff	VBIDDLE 12/28/2015		DRAFT		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	NTK Precision Axle Corp	023-36448-00038	Type of Mail: CERTIFICATE OF MAILING ONLY		
		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204			

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Terry Jacot NTK Precision Axle Corp 741 S CR 200 W Frankfort IN 46041-8704 (Source CAATS)										
2		Tadao Okamura President NTK Precision Axle Corp 741 S CR 200 W Frankfort IN 46041-8704 (RO CAATS)										
3		Frankfort City Council and Mayors Office 301 E. Clinton Street Frankfort IN 46041 (Local Official)										
4		Frankfort Community Public 208 W Clinton Frankfort IN 46041-1811 (Library)										
5		Clinton County Health Department 400 E Clinton Street Frankfort IN 46041 (Health Department)										
6		Clinton County Board of Commissioners 125 Courthouse Square Frankfort IN 46041-1942 (Local Official)										
7		Gerry Trzupke Huff & Huff, Inc. 915 Harge rRoad, Suite 330 Oak Brook IL 60523 (Consultant)										
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10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender 7	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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