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

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Minor Source Operating Permit (MSOP)

for LH Industries in Allen County

MSOP No.: M003-37271-00418

The Indiana Department of Environmental Management (IDEM) has received an application from LH Industries, located at 4420 Clubview Drive, Fort Wayne, Indiana 46804, for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow LH Industries to construct and operate a new stationary laminated stamping operation.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

IDEM is aware that the source has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft MSOP contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Allen County Public Library - Waynedale Branch Library
2200 Lower Huntington Road
Fort Wayne, IN 46819

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 M003-37271-00418 in all correspondence.

Comments should be sent to:

Brandon Miller
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 5-4374
Or dial directly: (317) 234-5374
Fax: (317) 232-6749 attn: Brandon Miller
E-mail: bmiller@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 Brandon Miller of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

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Michael R. Pence
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Commissioner

DRAFT

New Source Construction and Minor Source Operating Permit
OFFICE OF AIR QUALITY

LH Industries
4420 Clubview Drive
Fort Wayne, Indiana 46804

(herein known as the Permittee) is hereby authorized to construct and 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 2-5.1, 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.: M003-37271-00418	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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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 stamped metal parts operation, including various steel laminated parts and copper parts.

Source Address:	4420 Clubview Drive, Fort Wayne, Indiana 46804
General Source Phone Number:	260-432-5563
SIC Code:	3499 (Fabricated Metal Products, Not Elsewhere Classified)
County Location:	Allen
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) Seventeen (17) metal stamping presses, collectively identified as RED-MSP, constructed in 1982, continuously flooded with a VOC containing oil at a maximum capacity of 0.022 gallons per hour, no control, and exhausting indoors.

(b) Fifteen (15) metal stamping presses, collectively identified as LAM-MSP, constructed in 1994, continuously flooded with a VOC containing oil at a maximum capacity of 1.88 gallons per hour, no control, and exhausting indoors.

(c) Fifty-two (52) grinders, collectively identified as GRIND, constructed prior to 1994, with a maximum capacity of 0.24 pounds of metal grindings per hour, and exhausting indoors. The grinding units consist of both jig grinders and surface grinders. The jig grinders are controlled by a dust collector, identified as DC-1. The surface grinders are controlled by a dust collector, identified as DC-2.

(d) Four (4) twenty (20) gallon parts washers, collectively identified as WASH, constructed in 1984, with a maximum capacity of 180 gallons of solvent per year, no control, and exhausting indoors.

(e) Natural gas combustion units, no control, and identified as follows:

Unit/Stack ID	Unit Type	Heat Input Capacity (MMBtu/hr)
SH-1	Ceiling Hanging Unit	0.1320
SH-2	Ceiling Hanging Unit	0.1320
SH-3	Ceiling Hanging Unit	0.1320
SH-4	Ceiling Hanging Unit	0.0870
SH-5	Ceiling Hanging Unit	0.0870
SH-6	Ceiling Hanging Unit	0.0870
SH-7	Ceiling Hanging Unit	0.0870
SH-8	Ceiling Hanging Unit	0.0870
SH-9	Ceiling Hanging Unit	0.0870
SH-10	Roof Top Unit	1.4440
SH-11	Space Heater	0.1000
SH-12	HVAC	0.3000
SH-13	Maintenance Heater	0.1250
SH-14	HVAC	0.2500
SH-15	HVAC	0.2040
	HVAC	0.2040
SH-16	HVAC	0.0800
SH-17	HVAC	0.1200
SH-18	HVAC	0.2500
	HVAC	0.2500
SH-19	Space Heater	0.1200
	Space Heater	0.1200
SH-20	HVAC	0.1700
SH-21	HVAC	0.2250
SH-22	HVAC	0.2500
SH-23	HVAC	0.2500
	HVAC	0.2500
	HVAC	0.2500

(f) Paved roadways.

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

(b) If actual construction of the emission units differs from the construction described in the application, the source may not continue operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

(a) This permit, M003-37271-00418, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) All terms and conditions of permits established prior to M003-37271-00418 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.14 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

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

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

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

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

B.16 Source Modification Requirement

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

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

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.20 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Seventeen (17) metal stamping presses, collectively identified as RED-MSP, constructed in 1982, continuously flooded with a VOC containing oil at a maximum capacity of 0.022 gallons per hour, no control, and exhausting indoors.

(b) Fifteen (15) metal stamping presses, collectively identified as LAM-MSP, constructed in 1994, continuously flooded with a VOC containing oil at a maximum capacity of 1.88 gallons per hour, no control, and exhausting indoors.

(c) Fifty-two (52) grinders, collectively identified as GRIND, constructed prior to 1994, with a maximum capacity of 0.24 pounds of metal grindings per hour, and exhausting indoors. The grinding units consist of both jig grinders and surface grinders. The jig grinders are controlled by a dust collector, identified as DC-1. The surface grinders are controlled by a dust collector, identified as DC-2.

(d) Four (4) twenty (20) gallon parts washers, collectively identified as WASH, constructed in 1984, with a maximum capacity of 180 gallons of solvent per year, no control, and exhausting indoors.

(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 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-2]

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

(a) Pursuant to 326 IAC 8-3-2(a), the owner or operator of a cold cleaner degreaser 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) Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser subject to this subsection 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.1.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8(b)(2), the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.1.4 Record Keeping Requirements

(a) Pursuant to 326 IAC 8-3-8(c)(2) and to document the compliance status with Condition D.1.2, the Permittee shall maintain each of the following records for each purchase:

(1) The name and address of the solvent supplier.

(2) The date of purchase (or invoice/bill date of contract servicer indicating service date).

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).

(6) All records required by Condition D.1.4(a)(1) through (5) shall be:

(A) retained on-site or accessible electronically from the site for the most recent three (3) year period; and

(B) reasonably accessible for an additional two (2) year period.

(b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	LH Industries
Address:	4420 Clubview Drive
City:	Fort Wayne, Indiana 46804
Phone #:	260-432-5563
MSOP #:	M003-37271-00418

I hereby certify that LH Industries is:

- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that LH Industries is:

- ☐ in compliance with the requirements of MSOP M003-37271-00418.
- ☐ not in compliance with the requirements of MSOP M003-37271-00418.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

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

LH Industries
4420 Clubview Drive
Fort Wayne, Indiana 46804

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that LH Industries 4420 Clubview Drive, Fort Wayne, Indiana 46804, has constructed and will operate a laminated stamping operation on _____in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on June 6, 2016 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M003-37271-00418, Plant ID No. 003-00418 issued on _____.

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature_____
Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana

on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature_____
Name_____ (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	**LH Industries**
Source Location:	**4420 Clubview Drive, Fort Wayne, Indiana 46804**
County:	**Allen**
SIC Code:	**3499 (Fabricated Metal Products, Not Elsewhere Classified)**
Operation Permit No.:	**003-37271-00418**
Permit Reviewer:	**Brandon Miller**

On June 6, 2016, the Office of Air Quality (OAQ) received an application from LH Industries related to the construction and operation of an existing stationary stamped metal parts operation, including various steel laminated parts and copper parts.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Allen 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. Allen 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) $PM_{2.5}$

Allen County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Allen 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 criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

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

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by LH Industries on June 6, 2016, relating to the construction and operation of an existing stationary laminated stamping operation. The source began operation in 1982. Based on the construction dates provided, the source would have operated under an exemption in 1982. Subsequent construction is detailed as follows:

1982
The source started operation of 17 metal stamping presses, under an exempt status.

1984
The source added four (4) twenty (20) gallon parts washers to the operation. The PTE of this addition would not have increased the level of the permit needed. The source would still have been an exemption.

1994
The source added fifteen (15) metal stamping presses, collectively identified as LAM-MSP. Based on the PTE of the LAM-MSP, the source would have needed to send in a permit application at this time for evaluation.

Based on the PTE, the source has the capability to emit greater than 25 tons per year but less than 100 tons per year of VOC and will be issued a MSOP.

The source consists of the following permitted emission units:

(a) Seventeen (17) metal stamping presses, collectively identified as RED-MSP, constructed in 1982, continuously flooded with a VOC containing oil at a maximum capacity of 0.022 gallons per hour, no control, and exhausting indoors.

(b) Four (4) twenty (20) gallon parts washers, collectively identified as WASH, constructed in 1984, with a maximum capacity of 180 gallons of solvent per year, no control, and exhausting indoors.

(c) Fifty-two (52) grinders, collectively identified as GRIND, constructed prior to 1994, with a maximum capacity of 0.24 pounds of metal grindings per hour, and exhausting indoors. The grinding units consist of both jig grinders and surface grinders. The jig grinders are controlled by a dust collector, identified as DC-1. The surface grinders are controlled by a dust collector, identified as DC-2.

(d) Natural gas combustion units, no control, and identified as follows:

Unit/Stack ID	Unit Type	Heat Input Capacity (MMBtu/hr)
SH-1	Ceiling Hanging Unit	0.1320
SH-2	Ceiling Hanging Unit	0.1320
SH-3	Ceiling Hanging Unit	0.1320
SH-4	Ceiling Hanging Unit	0.0870
SH-5	Ceiling Hanging Unit	0.0870
SH-6	Ceiling Hanging Unit	0.0870
SH-7	Ceiling Hanging Unit	0.0870
SH-8	Ceiling Hanging Unit	0.0870
SH-9	Ceiling Hanging Unit	0.0870
SH-10	Roof Top Unit	1.4440
SH-11	Space Heater	0.1000
SH-12	HVAC	0.3000
SH-13	Maintenance Heater	0.1250
SH-14	HVAC	0.2500
SH-15	HVAC	0.2040
	HVAC	0.2040
SH-16	HVAC	0.0800
SH-17	HVAC	0.1200
SH-18	HVAC	0.2500
	HVAC	0.2500
SH-19	Space Heater	0.1200
	Space Heater	0.1200
SH-20	HVAC	0.1700
SH-21	HVAC	0.2250
SH-22	HVAC	0.2500
SH-23	HVAC	0.2500
	HVAC	0.2500
	HVAC	0.2500

(e) Paved roadways.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

(a) Fifteen (15) metal stamping presses, collectively identified as LAM-MSP, constructed in 1994, continuously flooded with a VOC containing oil at a maximum capacity of 1.88 gallons per hour, no control, and exhausting indoors.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	3.31
PM10[(1)]	1.68
PM2.5	1.35
SO_2	0.02
NO_x	2.52
VOC	47.81
CO	2.12

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Cobalt	0.26
Hexane	0.05
Formaldehyde	negl.
Toluene	negl.
Benzene	negl.
TOTAL HAPs	**0.31**

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is 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.

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10*	PM2.5*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Stamping (1)	0	0	0	-	-	47.60	-	-	-
Grinders	1.05	1.05	1.05	-	-	-	-	0.26	0.26 Cobalt
Parts Washer	-	-	-	-	-	0.07	-	-	-
Natural Gas Combustion	0.05	0.19	0.19	0.02	2.52	0.14	2.12	0.05	0.05 Hexane
Paved Roadways	2.21	0.44	0.11	-	-	-	-	-	-
Total PTE of Entire Source	**3.31**	**1.68**	**1.35**	**0.02**	**2.52**	**47.81**	**2.12**	**0.31**	**0.26 Cobalt**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
(1) The stamping processes have no particulate emissions since the processes are flooded with oil.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit, since the four (4) Parts Washers, collectively identified as WASH, do not use any solvent containing the following chemicals:

(1) methylene chloride (CAS No. 75-09-2);
(2) perchloroethylene (CAS No. 127-18-4);
(3) trichloroethylene (CAS No. 79-01-6);
(4) 1,1,1-trichloroethane (CAS No. 71-55-6);
(5) carbon tetrachloride (CAS No. 56-23-5);
(6) chloroform (CAS No. 67-66-3); or
(7) any combination of these halogenated HAP solvents,

in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

(c) The requirements of the NESHAP for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit for the fifty-two grinders, even though the source is primarily engaged in the operations of Fabricated

Metal Products, Not Elsewhere Classified (Standard Industrial Classification (SIC) Code 3499) which is listed as being an affected source in 40 CFR 63.11514(a)(2), the source:

(A) does not dry grind which use materials that contain metal fabrication or finishing metal HAP (MFHAP) as defined in 40 CFR 63.11522 or that have the potentail to emit MFHAP. The material safety data sheet for the grinding material contains Cobalt which is not a MFHAP; and

(B) the definition for dry grinding and dry polishing with machines, 40 CFR 63.11522, specifically excludes hand grinding, hand polishing, and bench top dry grinding and dry polishing. All of the grinders are bench top dry grinding units.

(d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

(e) 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

The following state rules are applicable to the source:

(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))
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:
(1) The potential to emit all PSD regulated pollutants are less than 250 tons per year,
(2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is 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 2-4.1.

(d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

(1) 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.

(2) 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.

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

(g) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(h) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Metal Stamping Presses (LAM-MSP)

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the fifteen (15) metal stamping presses, collectively identified as LAM-MSP, are not subject to the requirements of 326 IAC 6-3, because there are no particulate emissions.

(b) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The metal stamping presses, collectively identified as LAM-MSP, were constructed after January 1, 1980 and are not otherwise regulated by:

(A) Other provisions in 326 IAC 8;
(B) 326 IAC 20-48; or
(C) 326 IAC 20-56.

The sheet metal comes into each metal stamping press and the part associated with that metal stamping press is stamped. The part is then processed as a finished product, packaged, and shipped. It does not go to another stamping machine. Therefore, each metal stamping press operates independently from one another. Each metal stamping press is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each metal stamping press is less than twenty-five (25) tons per year.

(c) There are no other 326 IAC 8 Rules that are applicable to LAM-MSP.

Metal Stamping Presses (RED-MSP)

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the seventeen (17) metal stamping presses, collectively identified as RED-MSP, are not subject to the requirements of 326 IAC 6-3, because there are no particulate emissions.

(b) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The metal stamping presses, collectively identified as RED-MSP, were constructed after January 1, 1980 and are not otherwise regulated by:

(A) Other provisions in 326 IAC 8;
(B) 326 IAC 20-48; or
(C) 326 IAC 20-56.

The sheet metal comes into each metal stamping press and the part associated with that metal stamping press is stamped. The part is then processed as a finished product, packaged, and shipped. It does not go to another stamping machine. Therefore, each metal stamping press operates independently from one another. Each metal stamping press is not subject to the

requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each metal stamping press is less than twenty-five (25) tons per year.

(c) There are no other 326 IAC 8 Rules that are applicable to RED-MSP.

Grinders (GRIND)

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the fifty-two (52) grinders, collectively identified as GRIND, are not subject to the requirements of 326 IAC 6-3, because the potential to emit particulate from each grinder is less than 0.511 pounds per hour.

(b) There are no 326 IAC 8 Rules that are applicable to GRIND.

Parts Washers (WASH)

(a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the parts washers, identified as WASH, are exempt from the requirements of 326 IAC 6-3-2, because the potential to emit particulate from each parts washer is less than 0.551 pounds per hour.

(b) 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)
The four (4) parts washers, collectively identified as WASH, each meet the definition of a cold cleaner degreasing operation. The emission units were constructed after July 1, 1990 and are not equipped with remote solvent reservoirs. Therefore, these operations are subject to the requirements of 326 IAC 8-3-2.

Pursuant to 326 IAC 8-3-2(a), the owner or operator of a cold cleaner degreaser 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.

Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser subject to this subsection 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.

(c) 326 IAC 8-3-8 (Material Requirements for cold cleaner degreasers)
326 IAC 8-3-8 applies to any person who sells, offers for sale, uses, or manufacturers solvent for use in cold cleaner degreasers before January 1, 2015, in Clark, Floyd, Lake or Porter Counties or on and after January 1, 2015, anywhere in the state. This source is located in a Putnam County and uses solvent in cold cleaner degreasers. Therefore, effective January 1, 2015, the degreasing operations are subject to the requirements of 326 IAC 8-3-8.

(a) Material requirements are as follows:

(1) No person shall operate a cold cleaner 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).

(b) Record keeping requirements are as follows:

(1) All persons subject to the requirements of subsection (a)(1) shall maintain each of the following records for each purchase:

(A) The name and address of the solvent supplier.

(B) The date of purchase (or invoice/bill date of contract servicer indicating service date).

(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).

(c) All records required by subsection (b) shall be:

(1) retained on-site or accessible electronically from the site for the most recent three (3) year period; and

(2) reasonably accessible for an additional two (2) year period.

(d) There are no other 326 IAC 8 Rules that are applicable to these degreasers

Natural Gas Combustion Sources

(a) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired heating units are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.

(b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired heating units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

(c) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This source is not subject to 326 AIC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas-fired heating unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.

(d) There are no 326 IAC 8 Rules that are applicable to these heating units.

Compliance Determination, Monitoring and Testing Requirements

(a) There are no compliance determination and monitoring requirements for this source. All of the units at the source individually have less than twenty-five (25) tons per year of each criteria pollutant and all of the units are exempted out of applicable state rules that would require determination requirements or monitoring requirements. The parts washers are subject to compliance determination and monitoring requirements, however the rules applicable to the parts washers state the compliance determination and monitoring requirements required for those units.

(b) There are no testing requirements applicable to this source.

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 June 6, 2016.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 003-37271-00418. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Brandon Miller 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emissions Summary

Company Name: LH Industries
Address City IN Zip: 4420 Clubview Drive, Fort Wayne, Indiana 46804
Permit Number: 003-37271-00418
Reviewer: Brandon Miller

	Uncontrolled Potential to Emit (tons/yr)								
	Pollutant								
Facility	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	HAPs	Single HAP
Stamping [(1)]	0	0	0	-	-	47.60	-	-	-
Grinders	1.05	1.05	1.05	-	-	-	-	0.26	0.26 Cobalt
Parts Washer	-	-	-	-	-	0.07	-	-	-
Natural Gas Combustion	0.05	0.19	0.19	0.02	2.52	0.14	2.12	0.05	0.05 Hexane
Paved Roadways	2.21	0.44	0.11	-	-	-	-	-	-
Total	**3.31**	**1.68**	**1.35**	**0.02**	**2.52**	**47.81**	**2.12**	**0.31**	**0.26 Cobalt**

(1) The stamping processes do not have particulate emissions since the processes are flooded with oil.

Emission Calculations
Stamping - Oil Usage

Company Name: LH Industries
Address City IN Zip: 4420 Clubview Drive, Fort Wayne, Indiana 46804
Permit Number: 003-37271-00418
Reviewer: Brandon Miller

Process	Material	Total Number of Presses	Density (lb/gal)	Maximum Gallons Used per Year	Max Usage per hour (gal/hr)	Weight % volatile (H2O & Organics)	Weight % water	Weight % Organics	Volume % Water	Lbs VOC/gal of usage less water	Pounds of VOC per Gallon	PTE VOC (lbs/hr)	PTE VOC (lbs/day)	PTE VOC (tons/yr)	PTE VOC per Press (tons/yr)
LAM-MSP	Metdraw 5180	15	6.33	16,500	1.88	100.00%	10.00%	90.00%	10.00%	6.33	5.70	10.73	257.54	47.00	3.13
RED-MSP	Oak 50-5	17	6.66	196	0.02	100.00%	8.00%	92.00%	8.00%	6.66	6.13	0.14	3.29	0.60	0.04
											TOTAL	**10.87**	**260.83**	**47.60**	

Methodology
Max Usage per hour (gal/hr) = Gallons Used per Year * (1 year/8,760 hrs)
Pounds of VOC per Gallon usage less water = (Density lb/gal * Weight % organics)/(1- Volume % Water)
Pounds of VOC per Gallon = Density (lb/gal) * Weight % Organics
PTE VOC (lbs/hr) =Max Usage per hour (gal/hr) * Pounds of VOC per gallon
PTE VOC (lbs/day) = PTE VOC (lbs/hr) * 24 hrs/day
PTE VOC (tons/yr) = PTE VOC (lbs/hr) * (8,760 hrs/yr) * (1 ton/2,000 lbs)
PTE VOC per Press (tons/yr) = PTE VOC (tons/yr) / Total Number of Presses
Neither material contains HAPs.
There are no PM, PM10, or PM2.5 emissions associated with the Stamping processes because the stamping process is flooded with liquid.

Emissions Calculations
Grinders

Company Name: LH Industries
Address City IN Zip: 4420 Clubview Drive, Fort Wayne, Indiana 46804
Permit Number: 003-37271-00418
Reviewer: Brandon Miller

2015 Actual Usage Rate	Hours worked per Shift	Shift 1 grinder usage (percentage)	Shift 2 grinder Usage (percentage)	Hours Worked Saturdays	Grinder Usage Saturdays (percentage)	Shift 1 Grinder Usage 2015 (hrs)	Shift 2 Grinder Usage 2015 (hrs)	Saturday Grinder Usage 2015 (hrs)	Total Operational Hours Grinders 2015
All Grinders	10	90%	30%	4.00	10%	2,340	780.00	20.80	3,140.8

Permit Unit ID	Source Components	Cubic Feet Collected	Density of Steel Dust (lbs/cubic ft)	Particulate Collected (lbs/year 2015)	Uncontrolled Particulate (lbs/hr)	Uncontrolled PTE PM (tons/yr)	Cobalt (% by weight)	Cobalt (lbs/hr)	Cobalt (tons/yr)	Control Efficiency
GRIND	Jig Grind	3.00	150.00	450.00	0.14	0.63	25.00%	0.036	0.16	99.99%
	Surface Grind	2.00	150.00	300.00	0.10	0.42	25.00%	0.024	0.10	99.99%
					Totals	**1.05**			**0.26**	

Methodology
Source provided information on cubic feet collected in 1 year.
During that 1 year, there were 2 10-hour shifts, 5 days a week. Work occurred sometimes on Saturdays for 4 hrs a week.
Shift 1 Grinder Usage 2015 (hrs) = Hours worked per Shift * Shift 1 grinder usage (percentage) * 5 shifts a week * 52 weeks a year
Shift 2 Grinder Usage 2015 (hrs) = Hours worked per Shift * Shift 2 grinder usage (percentage) * 5 shifts a week * 52 weeks a year
Saturday Grinder Usage 2015 (hrs) = Grinder Usage Saturdays (percentage) * Hours Worked Saturdays * 52 Saturdays a year
Total Operation Hours Grinders 2015 = Shift 1 Grinder Usage 2015 + Shift 2 Grinder Usage 2015 + Saturday Grinder Usage 2015
Density of Steel Dust (lbs/cubic ft) from www.engineeringtoolbox.com
Particulate Collected (lbs/year 2015) = Size of Buckets (cubic ft) * Density of Steel Dust (lbs/cubic ft)
Source provided control efficiency of dust collector to be 99.99%.
Uncontrolled Particulate (lbs/hr) = Particulate Collected (lbs/year 2015)/Control Efficiency * (year 2015/Total Operation Hours Grinders 2015)
Uncontrolled PTE PM (tons/yr) = Uncontrolled Particulate (lbs/hr) * 1 ton/2,000 lbs * 8,760 hrs/yr
PM = PM10 = PM2.5
Cobalt compounds are HAPs.

Emission Calculations
Parts Washer - Degreasing

Company Name: LH Industries
Address City IN Zip: 4420 Clubview Drive, Fort Wayne, Indiana 46804
Permit Number: 003-37271-00418
Reviewer: Brandon Miller

Emission Unit	Maximum Annual Solvent Usage (gallons)	VOC Solvent Density (lbs/gallon)	VOC Emissions (tons/yr)
WASH	180	0.82	0.07

Methodology
VOC PTE (tons/yr) = Maximum Annual Solvent Usage (gallons) * VOC Solvent Density (lbs/gallon) * (1 ton/2,000 lbs)
Solvent contains no HAPs.

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

Company Name: LH Industries
Address City IN Zip: 4420 Clubview Drive, Fort Wayne, Indiana 46804
Permit Number: 003-37271-00418
Reviewer: Brandon Miller

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
5.88	1020	50.50

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.05	0.19	0.19	0.02	2.52	0.14	2.12

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

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
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	5.3E-05	3.0E-05	1.9E-03	0.05	8.6E-05	**0.05**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
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	1.3E-05	2.8E-05	3.5E-05	9.6E-06	5.3E-05	**1.4E-04**
					Total HAPs	**0.05**
					Worst HAP	**0.05**

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

Appendix A: Emissions Calculations
List of Natural Gas Combustion Units

Company Name: LH Industries
Address City IN Zip: 4420 Clubview Drive, Fort Wayne, Indiana 46804
Permit Number: 003-37271-00418
Reviewer: Brandon Miller

Emission Units		
Unit ID	**Unit Type**	**Heat Input Capacity (MMBtu/hr)**
SH-1	Ceiling Hanging Unit	0.1320
SH-2	Ceiling Hanging Unit	0.1320
SH-3	Ceiling Hanging Unit	0.1320
SH-4	Ceiling Hanging Unit	0.0870
SH-5	Ceiling Hanging Unit	0.0870
SH-6	Ceiling Hanging Unit	0.0870
SH-7	Ceiling Hanging Unit	0.0870
SH-8	Ceiling Hanging Unit	0.0870
SH-9	Ceiling Hanging Unit	0.0870
SH-10	Roof Top Unit	1.4440
SH-11	Space Heater	0.1000
SH-12	HVAC	0.3000
SH-13	Maintenance Heater	0.1250
SH-14	HVAC	0.2500
SH-15	HVAC	0.2040
	HVAC	0.2040
SH-16	HVAC	0.0800
SH-17	HVAC	0.1200
SH-18	HVAC	0.2500
	HVAC	0.2500
SH-19	Space Heater	0.1200
	Space Heater	0.1200
SH-20	HVAC	0.1700
SH-21	HVAC	0.2250
SH-22	HVAC	0.2500
SH-23	HVAC	0.2500
	HVAC	0.2500
	HVAC	0.2500
	Total	**5.88**

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: LH Industries
Address City IN Zip: 4420 Clubview Drive, Fort Wayne, Indiana 46804
Permit Number: 003-37271-00418
Reviewer: Brandon Miller

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 Informtation (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)
Vehicles (entering plant) (one-way trip)	15.0	1.0	15.0	22.0	330	600	0.114	1.7	622.2
Vehicles (leaving plant) (one-way trip)	15.0	1.0	15.0	15.0	225	600	0.114	1.7	622.2
Personal Vehicle (Entering Plant)	189.0	1.0	189.0	2.0	378	600	0.114	21.5	7,839.2
Personal Vehicle (Leaving Plant)	189.0	1.0	189.0	2.0	378	600	0.114	21.5	7,839.2
		Totals	**408.0**		**1,311**			**46.4**	**16,922.7**

Average Vehicle Weight Per Trip = 3.2 tons/trip
Average Miles Per Trip = 0.11 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 =	3.2	3.2	3.2	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = 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 = Ef * [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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.286	0.057	0.0140	lb/mile
Mitigated Emission Factor, Eext =	0.262	0.052	0.0128	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)
Vehicles (entering plant) (one-way trip)	0.09	0.02	0.00	0.08	0.02	0.00
Vehicles (leaving plant) (one-way trip)	0.09	0.02	0.00	0.08	0.02	0.00
Personal Vehicle (Entering Plant)	1.12	0.22	0.06	1.03	0.21	0.05
Personal Vehicle (Leaving Plant)	1.12	0.22	0.06	1.03	0.21	0.05
Totals	**2.42**	**0.48**	**0.12**	**2.21**	**0.44**	**0.11**

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]
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle 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

Notice of Public Comment

September 26, 2016
LH Industries
003-37271-00418

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 2/17/2016

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

September 26, 2016

To: Allen County Public Library

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

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

Applicant Name: LH Industries
Permit Number: 003-37271-00418

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 2/16/2016

Indiana Department of Environmental Management
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

September 26, 2016

Journal Gazette
600 W Main Street
PO Box 100
Fort Wayne, IN 46801

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for LH Industries, Allen 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 September 28, 2016.

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 Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: New Source Construction & Minor Source Operating Permit
Permit Number: 003-37271-00418

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 9/26/2016 LH Industries 003-37271-00418 Draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	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		Felipe Rodriquez LH Industries 4420 Clubview Dr Fort Wayne IN 46804 (Source CAATS)									
2		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 *(Local Official)*									
3		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 *(Health Department)*									
4		Mr. Jason Morrison SevenGen 604 West Wayne Street Fort Wayne IN 46802 *(Consultant)*									
5		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 *(Affected Party)*									
6		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 *(Affected Party)*									
7		Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 *(Local Official)*									
8		Allen County Public Library, Waynedale Branch 2200 Lower Huntington Rd Fort Wayne IN 46809 *(Library)*									
9		Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 *(Affected Party)*									
10		J & B Importers J & B Importers 4620 Clubview Drive Ft. Wayne IN 46804 *(Affected Party)*									
11		American Renovations, Inc.. American Renovations, Inc… 4505 Engle Rd Ft. Wayne IN 46804 *(Affected Party)*									
12		Heavy Duty Manufacturing, Inc.. Heavy Duty Manufacturing, Inc.. 4317 Clubview Drive Ft. Wayne IN 46804 *(Affected Party)*									
13		American Sportworks American Sportworks 4404 Engle Ridge Drive Ft. Wayne IN 46804 (Affected Party)									
14		Hysterium Haunted House Hysterium Haunted House 4410 Arden Drive Ft. Wayne IN 46804 *(Affected Party)*									
15											

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14			

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