



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for FIC America Corporation in Knox County

MSOP No.: M083-37373-00045

The Indiana Department of Environmental Management (IDEM) has received an application from FIC America Corporation, located at 3320 South Keller Road, Vincennes, Indiana 47591, for a new source review and transition of its Exemption, issued on October 24, 2001, to an MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow FIC America Corporation to continue to operate its existing source.

The applicant intends to operate existing equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the entire 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:

Knox County Public Library
502 N. 7th St.
Vincennes, IN 47591

and

IDEM Southwest Regional Office
1120 N. Vincennes Avenue
P.O. Box 128
Petersburg, IN 47567-0128

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 M083-37373-00045 in all correspondence.

Comments should be sent to:

Allen Reimer
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-0863
Or dial directly: (317) 233-0863
Fax: (317) 232-6749 attn: Allen Reimer
E-mail: acreimer@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, at the IDEM Regional Office 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 Allen Reimer or my staff at the above address.



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



Indiana Department of Environmental Management

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Michael R. Pence
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Carol S. Comer
Commissioner

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

**FIC America Corporation
3320 South Keller Road
Vincennes, Indiana 47591**

(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. M083-37373-00045	
Issued by: Nathan C. Bell, 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 automotive welding and stamping operation.

Source Address:	3320 South Keller Road, Vincennes, Indiana 47591
General Source Phone Number:	812-895-4700
SIC Code:	3714
County Location:	Knox
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) MIG welders, consisting of the following:
 - (1) Three (3) MIG welders, identified as MW1 through MW3, constructed in 2005, with a maximum capacity to consume 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (2) Five (5) MIG welders, identified as MW4 through MW8, constructed in 2008, with a maximum capacity to consume 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (3) Three (3) MIG welders, identified as MW9 through MW11, constructed in 2010, with a maximum capacity to consume 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (4) Five (5) MIG welders, identified as MW12 through MW16, constructed in 2014, with a maximum capacity to consume 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (5) Eight (8) MIG welders, identified as MW17 through MW24, constructed in 2015, with a maximum capacity to consumer 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
- (b) Two (2) TIG welding stations, identified as TW1 and TW2, constructed in 2005, with a maximum capacity to consume 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
- (c) Laser welders, with a process weight rate of 459 pounds per hour, each, consisting of the following:
 - (1) Four (4) laser welders, identified as LW1 through LW4, constructed in 2005, uncontrolled, and exhausting indoors.

- (2) One (1) laser welder, identified as LW5, constructed in 2007, uncontrolled, and exhausting indoors.
- (3) One (1) laser welder, identified as LW6, constructed in 2008, uncontrolled, and exhausting indoors.
- (4) One (1) laser welder, identified as LW7, constructed in 2009, uncontrolled, and exhausting indoors.
- (5) Two (2) laser welders, identified as LW8 and LW9, constructed in 2010, uncontrolled, and exhausting indoors.
- (6) Two (2) laser welders, identified as LW10 and LW11, constructed in 2011, uncontrolled, and exhausting indoors.
- (7) One (1) laser welder, identified as LW12, constructed in 2012, uncontrolled, and exhausting indoors.
- (8) One (1) laser welder, identified as LW13, constructed in 2013, uncontrolled, and exhausting indoors.
- (d) Robotic resistance welders, consisting of the following:
 - (1) Nine (9) robotic resistance welders, identified as RW1 through RW9, constructed in 2002, with a maximum capacity to consume 0.012 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (2) Seven (7) robotic resistance welders, identified as RW10 through RW16, constructed in 2008, with a maximum capacity to consume 0.012 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (3) Twenty-five (25) robotic resistance welders, identified as RW17 through RW41, constructed in 2010, with a maximum capacity to consume 0.012 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (4) Thirty-two (32) robotic resistance welders, identified as RW42 through RW73, constructed in 2012, with a maximum capacity to consume 0.012 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (5) Twenty-nine (29) robotic resistance welders, identified as RW74 through RW102, constructed in 2014, with a maximum capacity to consume 0.012 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
- (e) Natural gas-fired space heating units, consisting of the following:
 - (1) Two (2) natural gas-fired roof heating units, identified as SH1 and SH2, constructed in 2002, with a maximum heat input capacity of 0.4 MMBtu per hour, each.
 - (2) Eight (8) natural gas-fired heating units, identified as SH3 through SH10, constructed in 2002, with a maximum heat input capacity of 0.2 MMBtu per hour, each.
 - (3) Thirty-nine (39) natural gas-fired heating units, identified as SH11 through SH49, constructed in 2005, with a maximum heat input capacity of 0.8 MMBtu per hour, each.

- (4) Three (3) natural gas-fired ground heating units, identified as SH50 through SH52, constructed in 2003, with a maximum heat input capacity of 1.0 MMBtu per hour, each.
 - (5) Five (5) natural gas-fired hanging heating units, identified as SH53 through SH57, constructed in 2002, with a maximum heat input capacity of 0.2 MMBtu per hour, each.
 - (6) Seventeen (17) natural gas-fired hanging heating units, identified as SH58 through SH74, constructed in 2005, with a maximum heat input capacity of 0.2 MMBtu per hour, each.
- (f) Maintenance machining areas, consisting of the following:
 - (1) One (1) maintenance machining area, identified as Kaizan area, constructed in 2001, including four (4) grinders, three (3) saws, and one (1) drill press, each with a maximum combined throughput of 24.3 pounds per hour, uncontrolled, and exhausting indoors.
 - (2) One (1) maintenance machining area, identified as Destruct Lab, constructed in 2001, including two (2) air chisels, two (2) grinders, two (2) saws, and one (1) sander, each with a maximum combined throughput of 0.23 pounds per hour, uncontrolled, and exhausting indoors.
 - (3) One (1) maintenance machining area, identified as Tool Room, constructed in 2005, including two (2) drill presses, two (2) milling machines, two (2) saws, three (3) grinders, two (2) sanders, two (2) lathes, and one (1) CNC machine, one (1) wire EDM machine, and one (1) profiler, each with a maximum combined throughput of 0.03 pounds per hour, uncontrolled, and exhausting indoors.
- (g) Ten (10) hydraulic presses used to stamp out structural automotive parts, with hydraulic lubricants delivered via an open loop hydraulic system.
- (h) Lubricants, sealants, and hydraulic oils containing no HAPs, with a maximum usage of 9,874.37 gallons per year, using non-atomized flow coating or brush methods of application.
- (i) Paved roads.

SECTION B GENERAL CONDITIONS

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

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

B.2 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, M083-37373-00045, 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 M083-37373-00045 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.

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:	FIC America Corporation
Address:	3320 South Keller Road
City:	Vincennes, Indiana 47591
Phone #:	812-895-4700
MSOP #:	M083-37373-00045

I hereby certify that FIC America Corporation is :

☐ still in operation.

☐ no longer in operation.

I hereby certify that FIC America Corporation is :

☐ in compliance with the requirements of
MSOP M083-37373-00045.

☐ not in compliance with the requirements of
MSOP M083-37373-00045.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Technical Support Document (TSD) for an Exemption Transitioning to a
Minor Source Operating Permit (MSOP) with New Source Review (NSR)

Source Description and Location
--

Source Name:	FIC America Corporation
Source Location:	3320 South Keller Road, Vincennes, IN 47591
County:	Knox
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
Operation Permit No.:	M083-37373-00045
Permit Reviewer:	Allen Reimer

On July 6, 2016, the Office of Air Quality (OAQ) received an application from FIC America Corporation related to the transition of an Exemption to a MSOP with NSR for its existing stationary automotive welding and stamping operation.

Existing Approvals

The source has been operating under Exemption No. 083-14894-00045, issued on October 24, 2001. Due to this application, the source is transitioning from an Exemption to a MSOP.

County Attainment Status

The source is located in Knox 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. Knox 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}**
Knox County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants
Knox 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.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) MIG welders, consisting of the following:
- (1) Three (3) MIG welders, identified as MW1 through MW3, constructed in 2005, with a maximum capacity to consume 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (2) Five (5) MIG welders, identified as MW4 through MW8, constructed in 2008, with a maximum capacity to consume 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (3) Three (3) MIG welders, identified as MW9 through MW11, constructed in 2010, with a maximum capacity to consume 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (4) Five (5) MIG welders, identified as MW12 through MW16, constructed in 2014, with a maximum capacity to consume 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (5) Eight (8) MIG welders, identified as MW17 through MW24, constructed in 2015, with a maximum capacity to consumer 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
- (b) Two (2) TIG welding stations, identified as TW1 and TW2, constructed in 2005, with a maximum capacity to consume 0.465 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
- (c) Laser welders, with a process weight rate of 459 pounds per hour, each, consisting of the following:
- (1) Four (4) laser welders, identified as LW1 through LW4, constructed in 2005, uncontrolled, and exhausting indoors.
 - (2) One (1) laser welder, identified as LW5, constructed in 2007, uncontrolled, and exhausting indoors.
 - (3) One (1) laser welder, identified as LW6, constructed in 2008, uncontrolled, and exhausting indoors.

- (4) One (1) laser welder, identified as LW7, constructed in 2009, uncontrolled, and exhausting indoors.
 - (5) Two (2) laser welders, identified as LW8 and LW9, constructed in 2010, uncontrolled, and exhausting indoors.
 - (6) Two (2) laser welders, identified as LW10 and LW11, constructed in 2011, uncontrolled, and exhausting indoors.
 - (7) One (1) laser welder, identified as LW12, constructed in 2012, uncontrolled, and exhausting indoors.
 - (8) One (1) laser welder, identified as LW13, constructed in 2013, uncontrolled, and exhausting indoors.
- (d) Robotic resistance welders, consisting of the following:
- (1) Nine (9) robotic resistance welders, identified as RW1 through RW9, constructed in 2002, with a maximum capacity to consume 0.012 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (2) Seven (7) robotic resistance welders, identified as RW10 through RW16, constructed in 2008, with a maximum capacity to consume 0.012 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (3) Twenty-five (25) robotic resistance welders, identified as RW17 through RW41, constructed in 2010, with a maximum capacity to consume 0.012 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (4) Thirty-two (32) robotic resistance welders, identified as RW42 through RW73, constructed in 2012, with a maximum capacity to consume 0.012 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
 - (5) Twenty-nine (29) robotic resistance welders, identified as RW74 through RW102, constructed in 2014, with a maximum capacity to consume 0.012 pound of welding wire per hour, each, uncontrolled, and exhausting indoors.
- (e) Natural gas-fired space heating units, consisting of the following:
- (1) Two (2) natural gas-fired roof heating units, identified as SH1 and SH2, constructed in 2002, with a maximum heat input capacity of 0.4 MMBtu per hour, each.
 - (2) Eight (8) natural gas-fired heating units, identified as SH3 through SH10, constructed in 2002, with a maximum heat input capacity of 0.2 MMBtu per hour, each.
 - (3) Thirty-nine (39) natural gas-fired heating units, identified as SH11 through SH49, constructed in 2005, with a maximum heat input capacity of 0.8 MMBtu per hour, each.
 - (4) Three (3) natural gas-fired ground heating units, identified as SH50 through SH52, constructed in 2003, with a maximum heat input capacity of 1.0 MMBtu per hour, each.
 - (5) Five (5) natural gas-fired hanging heating units, identified as SH53 through SH57, constructed in 2002, with a maximum heat input capacity of 0.2 MMBtu per hour, each.
 - (6) Seventeen (17) natural gas-fired hanging heating units, identified as SH58 through SH74, constructed in 2005, with a maximum heat input capacity of 0.2 MMBtu per hour, each.

- (f) Maintenance machining areas, consisting of the following:
- (1) One (1) maintenance machining area, identified as Kaizan area, constructed in 2001, including four (4) grinders, three (3) saws, and one (1) drill press, each with a maximum combined throughput of 24.3 pounds per hour, uncontrolled, and exhausting indoors.
 - (2) One (1) maintenance machining area, identified as Destruct Lab, constructed in 2001, including two (2) air chisels, two (2) grinders, two (2) saws, and one (1) sander, each with a maximum combined throughput of 0.23 pounds per hour, uncontrolled, and exhausting indoors.
 - (3) One (1) maintenance machining area, identified as Tool Room, constructed in 2005, including two (2) drill presses, two (2) milling machines, two (2) saws, three (3) grinders, two (2) sanders, two (2) lathes, and one (1) CNC machine, one (1) wire EDM machine, and one (1) profiler, each with a maximum combined throughput of 0.03 pounds per hour, uncontrolled, and exhausting indoors.
- (g) Ten (10) hydraulic presses used to stamp out structural automotive parts, with hydraulic lubricants delivered via an open loop hydraulic system.
- (h) Lubricants, sealants, and hydraulic oils containing no HAPs, with a maximum usage of 9,874.37 gallons per year, using non-atomized flow coating or brush methods of application.
- (i) Paved roads.

Emission Units Removed From the Source

The source has removed the following emission units:

- (a) Forty-seven (47) robotic MIG welders, with a maximum rate of 0.58 lbs/hr per station.

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 and operating permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP
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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	32.78
PM10 ⁽¹⁾	11.20
PM2.5	8.18
SO ₂	0.11
NO _x	17.61
VOC	18.63
CO	14.79
Total HAPs	0.51
Worst Single HAP	0.32 (Hexane)

(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".

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM 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.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, because the natural gas-fired units at this source each have a maximum heat input capacity of less than ten (10) million British thermal units per hour.
- (b) The requirements of the New Source Performance Standards (NSPS) for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source does not coat automobiles or light duty trucks as described in §60.390(a). This source consists of automotive welding and stamping operations.
- (c) The requirements of the New Source Performance Standards (NSPS) for Metal Coil Surface Coating, 40 CFR 60.460, Subpart TT (326 IAC 12), are not included in the permit, since this source does not coat metal coils as described in §60.460(a).
- (d) There are no other 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)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (326 IAC 20-85), are not included in the permit, since this source is not located at an automobile or light-duty truck assembly plant and is not a major source of HAPs as defined in §63.2.

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in this permit, since this source is not a major source of HAPs as defined in §63.2.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, Subpart PPPP (326 IAC 20-81), are not included in this permit, since this facility does not perform surface coating of plastic parts and products and is not a major source of HAPs as defined in §63.2.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Coil, Subpart SSSS (326 IAC 20-64), are not included in this permit, since this facility does not perform surface coating of metal coil and is not a major source of HAPs as defined in §63.2.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in the permit, since this source is not considered a major source of HAPs as defined in §63.2.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63, Subpart HHHHHH (63.11169 through 63.11180), are not included in the permit, since this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipment, and does not perform spray application of coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrates.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (326 IAC 20), are not included in the permit for the natural gas-fired combustion facilities, since, although this source is an area source of HAPs as defined in §63.2, each of the natural gas-fired combustion facilities is not considered an industrial, commercial, or institutional boiler as defined in §63.11237.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit because the operations at this source falls under SIC code 3714 (NAICS code 336330), which is not one of the nine source categories listed in 40 CFR 63.11514 (see Federal Register, 73 FR 43000, July 23, 2008, for the list of NAICS codes for regulated source categories).
- (m) 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)

- (n) 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.
- (g) 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.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.
- (i) 326 IAC 6.5 (PM Limitations Except Lake County)
This source is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne. This source is located in Knox County.
- (j) 326 IAC 6.8 (PM Limitations for Lake County)
This source is not subject to 326 IAC 6.8 because it is not located in Lake County. This source is located in Knox County.
- (k) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (l) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Welding

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) Pursuant to 326 IAC 6-3-1(a)(9), the requirements of 326 IAC 6-3-2 are not applicable to the twenty-four (24) MIG welders, two (2) TIG welders, and 102 Robotic Resistance welders, since the welding operations use less than six hundred twenty-five (625) pounds of welding wire per day, each.
- (2) Pursuant to 326 IAC 6-3-1(b)(15), the requirements of 326 IAC 6-3-2 are not applicable to the thirteen (13) laser welders, since the laser welding operations each have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Natural Gas-Fired Heaters

- (b) 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), the requirements of 326 IAC 6-2 are not applicable to the 74 natural gas-fired space heaters (SH1 through SH74), since each is not a source of indirect heat.
- (c) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3 are not applicable to the 74 natural gas-fired space heaters (SH1 through SH74), since each is not a "manufacturing process" as defined in 326 IAC 6-3-1.5.
- (d) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the requirements of 326 IAC 7-1.1 are not applicable to the 74 natural gas-fired space heaters (SH1 through SH74), because each unit's SO₂ PTE is less than 25 tons per year or ten (10) pounds per hour.
- (e) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Pursuant to 326 IAC 8-1-6(1), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the 74 natural gas-fired space heaters (SH1 through SH74), since the potential unlimited VOC emissions from each unit is less than 25 tons per year.

Maintenance Machining Areas

- (f) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable to the Kaizan Area, Destruct Lab and Tool Room, since each unit in each area does not have potential emissions of PM greater than five hundred fifty-one thousandths (0.551) pound per hour.

Lubricants, Sealants, and Hydraulic Oils

- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Pursuant to 326 IAC 8-1-6(1), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the lubricants, sealants, and hydraulic oils application operations, since it does not have potential emissions of VOC of 25 tons or more per year.
- (h) 326 IAC 8-2-2 (VOC Rules: Automobile and Light Duty Truck Coating Operations)
Pursuant to 326 IAC 8-2-2(a), the requirements of 326 IAC 8-2-2 are not applicable to the lubricants, sealants, and hydraulic oils application operations, since none are used as surface coatings for automobile or light duty trucks. The lubricants are used as stamping or machining

lubricants in the maintenance machining areas, the sealant is used to provide water and sound resistance to welded components in the welding operations, and the hydraulic oils are used in the hydraulic open loop system associated with the hydraulic press operations.

- (i) 326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Parts Coating Operations)
- (1) Pursuant to 326 IAC 8-2-9(a)(1), the requirements of 326 IAC 8-2-9 are not applicable to the lubricant application operations, because the lubricants are not coatings as defined in 326 IAC 8-1-0.5(b) and the Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings (see note 1 below). Pursuant to 326 IAC 8-1-0.5(b), "coating" means the application of protective, functional, or decorative films. These lubricants are used as stamping or machining lubricants in the hydraulic presses or maintenance machining operations, respectively, and can be considered protective oils that do not form a solid film. Additional information on the definition of coatings is provided below.

Note 1: As explained in Section IV, Subsection A, of the Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings, EPA-453/R-08-003, U.S. Environmental Protection Agency, September 2008, miscellaneous metal product and plastic parts coatings include paints, sealants, caulks, inks, and maskants, but decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances are not considered miscellaneous metal or plastic part coatings. This Control Techniques Guidelines document can be found on internet at the following website:

https://www3.epa.gov/ttn/caaa/t1/ctg/miscmetal_ctg093008.pdf

Note 2: As explained in 40 CFR 63, Subpart Mmmm, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, under 40 CFR 63.3981 (Definitions), "protective oil" means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

- (2) Pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-9 are not applicable to the hydraulic oil and sealant application operations, since, although the source was constructed after July 1, 1990, these operations do not have potential emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Paved Roads

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3 are not applicable to the paved roads, since they are not considered a "manufacturing process" as defined in 326 IAC 6-3-1.5.

Compliance Determination, Monitoring and Testing Requirements
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There are no compliance determination and monitoring 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 July 6, 2016.

The operation of this source shall be subject to the conditions of the attached proposed New Source Review and MSOP No. M083-37373-00045. The staff recommends to the Commissioner that this New Source Review and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Allen Reimer at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (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 Calculations**Potential to Emit****Summary**

Company Name: FIC America Corporation
Source Address: 3320 South Keller Road, Vincennes, IN 47591
Permit Number: M083-37373-00045
Reviewer: Allen Reimer

Uncontrolled Potential to Emit (tons/year)

Emissions Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Highest Single HAP	
Machining	7.32	0.73	0.73	-	-	-	-	-	-	-
Laser Welding	4.80	4.80	4.80	-	-	-	-	0.10	0.10	Manganese
MIG/TIG/Spot Welding	0.33	0.33	0.33	-	-	-	-	0.09	0.09	Manganese
Sealing/Stamping/Machining Fluids	-	-	-	-	-	17.66	-	-	-	-
Natural Gas	0.33	1.34	1.34	0.11	17.61	0.97	14.79	0.33	0.32	Hexane
Paved Roads	20.00	4.00	0.98	-	-	-	-	-	-	-
Total	32.78	11.20	8.18	0.11	17.61	18.63	14.79	0.51	0.32	Hexane

Controlled Potential to Emit (tons/year)

Emissions Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Highest Single HAP	
Machining	7.32	0.73	0.73	-	-	-	-	-	-	-
Laser Welding	4.80	4.80	4.80	-	-	-	-	0.10	0.10	Manganese
MIG/TIG/Spot Welding	0.33	0.33	0.33	-	-	-	-	0.09	0.09	Manganese
Sealing/Stamping/Machining Fluids	-	-	-	-	-	17.66	-	-	-	-
Natural Gas	0.33	1.34	1.34	0.11	17.61	0.97	14.79	0.33	0.32	Hexane
Paved Roads	20.00	4.00	0.98	-	-	-	-	-	-	-
Total	32.78	11.20	8.18	0.11	17.61	18.63	14.79	0.51	0.32	Hexane

**Appendix A: Emissions Calculations
Machining**

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Company Name: FIC America Corporation
Source Address: 3320 South Keller Road, Vincennes, IN 47591
Permit Number: M083-37373-00045
Reviewer: Allen Reimer

Emission Unit	# of Units	Individual Unit Throughput (lb/hr)	Individual Unit Throughput (ton/hr)	Total Throughput (lbs/hr)	Total Throughput (tons/hr)	PM Emission Factor (lb/ton)	PM10/PM2.5 Emission Factor (lb/ton)	Uncontrolled PTE PM (ton/yr)	Uncontrolled PM10/PM2.5 (ton/yr)	Uncontrolled PTE PM Per Unit (lb/hr)
Kaizan Area	8	24.30	0.012	194.4	0.097	17	1.7	7.24	0.72	0.207
Destruct Lab	7	0.23	1.15E-04	1.61	8.05E-04	17	1.7	0.06	0.01	0.002
Tool Room	16	0.03	1.50E-05	0.48	2.40E-04	17	1.7	0.02	1.79E-03	2.55E-04
Total								7.32	0.73	

Methodology

PM/PM10/PM2.5 Emission Factors for Secondary Metal Production, Grey Iron Foundries, Grinding/Cleaning (SCC 30400340)

Total Throughput (lb/hr) = Individual Unit Throughput (lb/hr) * # of Units

Total Throughput (ton/hr) = Total Throughput (lb/hr) * ton/2000 lbs

Uncontrolled PTE (tons/yr) = Total Throughput (tons/hr) * Emission Factor (lb/ton) * 8760 hrs/yr * ton/2000 lbs

326 IAC 6-3-2 Allowable PM Rate of Emissions (lbs/hr)

When the process weight rate is less than one hundred (100) lbs/hr, the allowable rate of emission is five hundred fifty-one thousandths (0.551) lb/hr.

Emission limitations for process weight rates up to sixty thousand pounds per hour shall be calculated with the following equation:

$$E \text{ (lb/hr)} = 4.10 P^{0.67}$$

Where: E = Rate of emission in pounds per hour
P = Process Weight Rate in tons per hour

$$326 \text{ IAC } 6-3-2 \text{ Allowable PM Rate of Emissions (lb/hr)} = 4.10 * (\text{Individual Unit Throughput (ton/hr)} ^{0.67})$$

**Appendix A: Emissions Calculations
Laser Welding**

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Company Name: FIC America Corporation
Source Address: 3320 South Keller Road, Vincennes, IN 47591
Permit Number: M083-37373-00045
Reviewer: Allen Reimer

Emission Unit	Number of Stations	Laser Power (W)	Emission Rates per welding station		Potential to Emit per welding station				Potential to Emit of all welding stations			
			PM/PM10/PM2.5 Emissions Rate (lb/hr)	Mn Emission Rate (lb/hr)	PM/PM10/PM2.5 Emissions (lb/hr)	Mn Emissions (lb/hr)	PM/PM10/PM2.5 Emissions (ton/yr)	Mn Emissions (ton/yr)	PM/PM10/PM2.5 Emissions (lb/hr)	Mn Emissions (lb/hr)	PM/PM10/PM2.5 Emissions (ton/yr)	Mn Emissions (ton/yr)
Laser Welding	13	3600	0.0843	0.0017	0.08	0.00	0.37	0.01	1.10	0.02	4.80	0.10
					Total		0.37	0.01		Total	4.80	0.10

Methodology

Emission Factors from the Journal of Laser Micro/Nanoengineering Vol. 6, No. 2, 2011 "Emission Data and Costs for Environmental Measures During Laser Joining of Metals"

PM/PM10/PM2.5 Emission Rate per welding station (lb/hr) = (38.3 g/hr) * (0.0022 lb/g) = 0.0843 lb/hr

Mn Emission Rate per welding station (lb/hr) = 0.0843 lb/hr * 2% = 0.0017 lb/hr

Potential to Emit PM/PM10/PM2.5 per welding station (lb/hr) = PM/PM10/PM2.5 Emission Rate per welding station (lb/hr)

Potential to Emit Mn per welding station (lb/hr) = Mn Emission Rate per welding station (lb/hr)

Potential to Emit PM/PM10/PM2.5 per welding station (tons/year) = Potential to Emit PM/PM10/PM2.5 per welding station (lb/hr) * 8760 hours/yr * ton/2000 lbs

Potential to Emit Mn per welding station (tons/year) = Potential to Emit Mn per welding station (lb/hr) * 8760 hours/yr * ton/2000 lbs

Potential to Emit PM/PM10/PM2.5 of all welding stations (lb/hr) = PM/PM10/PM2.5 Emission Rate per welding station (lb/hr) * Number of Stations

Potential to Emit Mn of all welding stations (lb/hr) = Mn Emission Rate per welding station (lb/hr) * Number of Stations

Potential to Emit PM/PM10/PM2.5 of all welding stations (tons/year) = Potential to Emit PM/PM10/PM2.5 of all welding stations (lb/hr) * 8760 hours/yr * ton/2000 lbs

Potential to Emit Mn Emission Rate of all welding stations (tons/year) = Potential to Emit Mn of all welding stations (lb/hr) * 8760 hours/yr * ton/2000 lbs

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

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Company Name: FIC America Corporation
Source Address: 3320 South Keller Road, Vincennes, IN 47591
Permit Number: M083-37373-00045
Reviewer: Allen Reimer

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption per station (lbs/day)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	0			0.036	0.011			0.000	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(carbon steel)	24	0.465	11.16	0.0055	0.0005			0.061	0.006	0.000	0	0.006
Stick (E7018 electrode)	0			0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	2	0.465	11.16	0.0055	0.0005			0.005	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)	0			0.0055	0.0005			0.000	0.000	0.000	0	0.000
Robotic Resistance Welders (Spot Welding)	102	0.012	0.288	0.0081	0.011			0.010	0.013	0.000	0	
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0			0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0			0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0.5	11	0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.08	0.02	0.00	0.00	0.01
Potential Emissions lbs/day								1.83	0.47	0.00	0.00	0.15
Potential Emissions tons/year								0.33	0.09	0.00	0.00	0.03

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emissions Calculations

VOC

Stamping Lubricant, Machining Lubricant, Sealant, and Hydraulic Oil

Company Name: FIC America Corporation
Source Address: 3320 South Keller Road, Vincennes, IN 47591
Permit Number: M083-37373-00045
Reviewer: Allen Reimer

Material	Purpose of Material	Density (Lb/Gal)	VOC Content (weight %)	VOC Content (lb/gal)	Maximum Usage (gal/yr)	Maximum Usage (gal/hr)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/year)	Transfer Efficiency
Cedar Draw S-105J	Stamping Lubricant	6.50	80.00%	5.20	6673.3	0.762	3.96	95.07	17.35	100%
CountryMark Anti-Wear 68	Hydraulic Oil	7.46	0.12%	0.01	128.3	0.015	0.00	0.00	0.00	100%
CountryMark Anti-Wear 100	Hydraulic Oil	7.46	0.12%	0.01	1452.5	0.166	0.00	0.04	0.01	100%
Cimtap II	Machining Lubricant	8.50	5.00%	0.43	3.5	0.000	0.00	0.00	0.00	100%
Cimtech 285	Machining Lubricant	8.58	10.00%	0.86	16.0	0.002	0.00	0.04	0.01	100%
Sika Seal 710	Sealant	10.83	2.50%	0.27	1575.0	0.180	0.05	1.17	0.21	100%
Denatured Alcohol	Metal Etching Process	6.67	100.00%	6.67	25.7	0.003	0.02	0.47	0.09	100%
Total					9,874.37		4.03	96.79	17.66	

Note: None of the materials contain HAPs.

Note: Source states there is no atomized spray application of any of the materials, therefore transfer efficiency is assumed to be 100%.

METHODOLOGY

Potential VOC (lbs/hr) = VOC Content (lb/gal) * Maximum Usage (gal/hr)

Potential VOC (lbs/day) = Potential VOC (lbs/hr) * (24 hr/day)

Potential VOC (tons/year) = VOC Content (lb/gal) * Maximum Usage (gal/yr) * (1 ton/2000 lbs)

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

Page 6 of 7 TSD App A

Company Name: FIC America Corporation
Source Address: 3320 South Keller Road, Vincennes, IN 47591
Permit Number: M083-37373-00045
Reviewer: Allen Reimer

Number of Units	Heat Input Capacity per unit (MMBtu/hr)	Total Heat Input Capacity (MMBtu/hr)	HHV mmBtu	Potential Throughput MMCF/yr
2	0.4	0.8		
8	0.2	1.6		
39	0.8	31.2		
3	1	3		
22	0.2	4.4		
Totals	74	41.00	1020	352.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC
	1.9	7.6	7.6	0.6	100	5.5
					**see below	
Potential Emission in tons/yr	0.33	1.34	1.34	0.11	17.61	0.97

*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
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	3.7E-04	2.1E-04	1.3E-02	0.32	6.0E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	8.8E-05	1.9E-04	2.5E-04	6.7E-05	3.7E-04
Methodology is the same as above.					Total HAPs
The five highest organic and metal HAPs emission factors are provided above.					0.33
Additional HAPs emission factors are available in AP-42, Chapter 1.4.					Worst HAP
					0.32

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

Page 7 of 7 TSD App A

Company Name: FIC America Corporation
Source Address: 3320 South Keller Road, Vincennes, IN 47591
Permit Number: M083-37373-00045
Reviewer: Allen Reimer

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Heavy Duty Vehicle (delivery/shipping) (empty)	170.0	1.0	170.0	20.0	3400.0	947	0.179	30.5	11129.0
Heavy Duty Vehicle (delivery/shipping) (full)	170.0	1.0	170.0	40.0	6800.0	947	0.179	30.5	11129.0
Passenger Vehicles (entering plant) (one-way trip)	400.0	1.0	400.0	2.5	1000.0	408	0.077	30.9	11281.8
Passenger Vehicles (leaving plant) (one-way trip)	400.0	1.0	400.0	2.5	1000.0	408	0.077	30.9	11281.8
Totals			1140.0		12200.0			122.8	44821.7

Average Vehicle Weight Per Trip =

10.7

 tons/trip
Average Miles Per Trip =

0.11

 miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (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 =	10.7	10.7	10.7	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, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p =

125

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

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	0.976	0.195	0.0479	lb/mile
Mitigated Emission Factor, E_{ext} =	0.892	0.178	0.0438	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)
Heavy Duty Vehicle (delivery/shipping) (empty)	5.43	1.09	0.27	4.97	0.99	0.24
Heavy Duty Vehicle (delivery/shipping) (full)	5.43	1.09	0.27	4.97	0.99	0.24
Passenger Vehicles (entering plant) (one-way trip)	5.50	1.10	0.27	5.03	1.01	0.25
Passenger Vehicles (leaving plant) (one-way trip)	5.50	1.10	0.27	5.03	1.01	0.25
Totals	21.87	4.37	1.07	20.00	4.00	0.98

Methodology

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

Abbreviations

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

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

October 6, 2016

Mr. Zane Duckworth
FIC America Corporation
3320 South Keller Road
Vincennes, IN 47591

Re: Public Notice
FIC America Corporation
Permit Level: New Source Review and
Minor Source Operating Permit (MSOP)
Permit Number: 083-37373-00045

Dear Mr. Duckworth:

Enclosed is a copy of your draft New Source Review and Minor Source Operating Permit (MSOP), Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Sun Commercial in Vincennes, Indiana publish the abbreviated version of the public notice no later than October 11, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Knox County Public Library, 502 North 7th Street in Vincennes, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Allen Reimer, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0863 or dial (317) 233-0863.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

October 6, 2016

Sun Commercial
702 Main Street
PO Box 396
Vincennes, IN 47591

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for FIC America Corporation, Knox 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 October 11, 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 Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: New Source Review and Minor Source Operating Permit (MSOP)
Permit Number: 083-37373-00045

Enclosure
PN Newspaper.dot 8/27/2015



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

October 6, 2016

To: Knox 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: FIC America Corporation
Permit Number: 083-37373-00045

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



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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

October 6, 2016
FIC America Corporation
083-37373-00045

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

Mail Code 61-53

IDEM Staff	VHAUN 10/6/2016 FIC America Corporation 083-37373-00045 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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											Remarks
1		Zane Duckworth FIC America Corporation 3320 S Keller Rd Vincennes IN 47591 (Source CAATS)									
2		Knox County Health Department 305 S 5th St Vincennes IN 47591 (Health Department)									
3		Knox Co Public Library 502 N 7th St Vincennes IN 47591-2101 (Library)									
4		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)									
5		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)									
6		Knox County Commissioners 111 N. 7th Street, #3 Vincennes in 47591 (Local Official)									
7		Christopher Koucky Cornerstone Environmental 880 Lennox Court Zionsville IN 46077 (Consultant)									
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