INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
*We Protect Hoosiers and Our Environment.*
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Eric J. Holcomb**
*Governor*

**Bruno L. Pigott**
*Commissioner*

**NOTICE OF 30-DAY PERIOD**
**FOR PUBLIC COMMENT**

Preliminary Findings Regarding a

the Renewal (with New Source Review) of a
Federally Enforceable State Operating Permit (FESOP)

for Matthew Warren, Inc. in Cass County

FESOP Renewal with New Source Review No.: F017-39266-00022

The Indiana Department of Environmental Management (IDEM) has received an application from Matthew Warren, Inc., located at 500 E. Ottawa St., Logansport, IN 46947, 300 E. Miami Ave., Logansport, IN 46947, 801 Bates St., Logansport, IN 46947, and 131 Godfrey St., Logansport, IN 46947, for a new source review and renewal of its FESOP issued on August 5, 2008. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Matthew Warren, Inc. to make certain changes at its existing source. Matthew Warren, Inc. has applied to construct construction of three (3) surface coating booths, three (3) clean-up operations for surface coating booths, two (2) natural gas-fired ovens, four (4) shot peen units, thirteen (13) grinders, one (1) parts washer, and two (2) natural gas-fired make-up air units.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Logansport Public Library
616 East Broadway
Logansport, IN 46947

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

**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 F017-39266-00022 in all correspondence.

**Comments should be sent to:**

Ethan Horvath
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Ethan Horvath or (317) 233-8397
Or dial directly: (317) 233-8397
Fax: (317) 232-6749 attn: Ethan Horvath
E-mail: EHorvath@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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

**What will happen after IDEM makes a decision?**

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

If you have any questions, please contact Ethan Horvath of my staff at the above address.

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

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*Governor*

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*Commissioner*

DRAFT

# Federally Enforceable State Operating Permit Renewal with New Source Review (NSR)

# OFFICE OF AIR QUALITY

## Matthew Warren, Inc.
## 500 E. Ottawa St.
## Logansport, Indiana 46947

(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.

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

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

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

| Operation Permit No.: F017-39266-00022<br>Master Agency ID: 223 | |
|---|---|
| Issued by:<br><br><br>Heath Hartley, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date:<br><br>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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary steel spring manufacturing operation.

| | |
|---|---|
| Source Address: | 500 E. Ottawa St., Logansport, Indiana 46947 |
| General Source Phone Number: | (574) 722-8245 |
| SIC Code: | 3495 (Wire Springs) |
| County Location: | Cass |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This source consists of the following two (2) plants:

(a) Plant 1 - Located at 500 E. Ottawa St., Logansport, Indiana 46947;
(b) Plant 2 - Located at 300 E. Miami Ave., Logansport, IN 46947;
(c) Plant 3 - Located at 500 E. Ottawa St., Logansport, Indiana 46947;
(d) Plant 5 - Located at 801 Bates St., Logansport, IN 46947;
(e) Plant 6 - Located at 131 Godfrey St., Logansport, IN 46947;

Since these five (5) plants are under the common ownership and control of Matthew Warren, Inc., have the same SIC code, 3495, and are located on adjacent properties, IDEM, OAQ finds that the five (5) Matthew Warren, Inc. plants are part of the same source.

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

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

**Plant #1:**

(a) One (1) dip, brush, and roll coating booth applying paints and inks to steel springs and miscellaneous metal parts, identified as SCP101, constructed in 1952, with a maximum capacity of 0.016 gallons per unit and 66.0 units per hour, using no controls, exhausting outdoors.

  (1) One (1) clean-up solvent used in paint booth SCP 101, with a maximum capacity of 1825.0 gallons per year, using no controls, and exhausting outdoors.

(b) Three (3) dip coating units applying paint to steel springs, identified as SCP102, SCP103, and SCP104, approved in 2018 for construction, applied using a paint tumbler, with a maximum capacity of 0.0003 gallons per unit and 1000.0 units per hour, each, using no controls, and venting outdoors.

(c) One (1) grinding operation, identified as Department 25, and consisting of:

(1) Fifteen (15) grinders, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors. The grinders are identified as the following:

(a) 125F076
(b) 125F070
(c) 125F031
(d) 127F035
(e) 125F022
(f) 127H001
(g) 125F039
(h) 125F027
(i) 125F021
(j) 125F034
(k) 125F023
(l) 125F019
(m) 125F020
(n) 125F044
(o) 125F069

(2) One (1) grinder, identified as 125F057, constructed prior to 2003, using a dust collector (125X031) as control, and exhausting outdoors.

(3) Five (5) grinders, with four (4) constructed prior to 2003 and 336F001 approved in 2018 for construction, using a dust collector (125X030) as control, and exhausting outdoors. The grinders are identified as the following:

(a) 125F055
(b) 125F059
(c) 125F054
(d) 125F056
(e) 336F001

(d) One (1) mixed manufacturing operation, located in Department 27, and consisting of the following:

(1) One (1) cut-off saw, identified as 127U004, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors.

(e) Five (5) shot peen units, located in Department 35, constructed prior to 2003, using a dust collector (533X005) as control, and exhausting outdoors. The shot peen units are identified as the following:

(1) 137H011
(2) 137H012
(3) 137H013
(4) 137H001
(5) 137H010

(f) Two (2) grinders, identified as 127F014 and 127F018, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors.

**Plant #2**

(g) Two (2) grinders, identified as 533F032 and 533F037, approved in 2018 for construction, using a dust collector (230X023) as control, and exhausting outdoors.

(h) Two (2) shot peen units, identified as 230H16 and 230H17, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting outdoors.

(i) Two (2) shot peen units, identified as 533H011 and 230H001, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting to outdoors.

(j) One (1) cut-off saw, identified as 130U010, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting outdoors.

**Plant #3**

(k) Three (3) shot peen units, identified as 336H001, 336H003, and 336H005 approved in 2018 for construction, using a dust collector (336X003) as control and a dust collector (336X002) as backup control, and exhausting outdoors.

(l) Three (3) tandem grinders, identified as 336F007, 336F008, and 336F010, approved in 2018 for construction, using a dust collector (336X003) as control and a dust collector (336X002) as backup control, and exhausting outdoors.

(m) Four (4) OD chamfer grinders, identified as 336F002, 336F003, 336F004, and 336F005, approved in 2018 for construction, using a dust collector (336X002) as control and a dust collector (336X003) as backup control, and exhausting outdoors.

(n) One (1) Fuel Cell operation consisting of the following:

(1) One (1) shot peen unit, identified as 336H004, approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.

(2) Two (2) grinders, identified as 336F006 and 336F007 approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.

(3) One (1) OD chamfer grinder, identified as 336F009, approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.

(o) One (1) wheel grinder, identified as 125F053, approved in 2018 for construction, using a dust collector (336X002) as control, and exhausting outdoors.

**Plant #5:**

(p) One (1) mixed manufacturing operation, located in Department 50, and consisting of the following:

(1) One (1) shot peen unit, identified as 550H005, constructed prior to 2003, using a dust collector (550X007) as control, and exhausting indoors.

(2) One (1) shot peen unit, identified as 550H007, constructed prior to 2003, using two (2) dust collectors (550X008 and 550X009) as control, and exhausting indoors and outdoors, respectively.

**Plant #6:**

(q) One (1) powder coating application system used for electrostatic spray application of dry epoxy powder to coiled steel springs, identified as 628S00P, constructed prior to 2003, with a maximum capacity of 0.00008 pounds per unit and 2,220 units per hour, using an integral dry cartridge filter as control, and exhausting outdoors.

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

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

**Plant #1**

(1) Two (2) natural gas-fired ovens, identified as 135L003 and 135L009, constructed prior to 2003, with a maximum heat input capacity of 0.53 and 1.0 MMBtu/hr, respectively, using no controls, and exhausting outdoors.

(2) One (1) natural gas-fired oven, identified as 135L008, constructed prior to 2003, with a maximum heat input capacity of 0.18 MMBtu/hr, using no controls, and exhausting outdoors.

(3) One (1) natural gas-fired oven, identified as 135L007, constructed prior to 2003, with a maximum heat input capacity of 0.5 MMBtu/hr, using no controls, and exhausting outdoors.

(4) One (1) natural gas-fired annealing furnace, identified as 352L010, constructed prior to 2003, with a maximum heat input capacity of 0.20 MMBtu/hr, using no controls, and exhausting outdoors.

(5) One (1) natural gas-fired oven, identified as OV-1, approved in 2018 for construction, with a maximum heat input capacity of 2.0 MMBtu/hr, using no controls, and exhausting outdoors.

**Plant #2**

(6) Two (2) natural gas-fired furnaces, identified as 330L010 and 330K012, constructed prior to 2003, with a maximum heat input capacity of 1.0 MMBtu/hr, each, using no controls, and exhausting indoors.

(7) Three (3) natural gas-fired bar furnaces, identified as 130J017, 533J016, and 130J011, constructed prior to 2003, with a maximum heat input capacity of 2.0, 1.5, and 4.1 MMBtu/hr, respectively, using no controls, and exhausting outdoors.

(8) Three (3) natural gas-fired draw furnaces, identified as 130L026, 533L021, and 533L020, constructed prior to 2003, with a maximum heat input capacity of 2.0, 1.0, and 0.8 MMBtu/hr, respectively, using no controls, and exhausting indoors.

(9) Two (2) natural gas-fired furnaces, identified as 130J024 and 533J025, constructed prior to 2003, with a maximum heat input capacity of 3.0 MMBtu/hr, each, using no controls, and exhausting outdoors.

**Plant #3**

(10) One (1) natural gas-fired heat stress oven, identified as 336L002, approved in 2018 for construction, with a maximum heat input capacity of 2.0 MMBtu/hr, using no controls, and exhausting outdoors.

(11) Two (2) make-up air units, identified as 336H001 and 336H002, approved for construction in 2018, with a maximum heat input capacity of 0.50 MMBtu/hr, each, using no controls, and exhausting outdoors.

**Plant #5**

(12) Three (3) natural gas-fired furnaces, identified as 550L001, 550L003, 550L005 constructed in 1998, 2001, and 2003, respectively, with a maximum heat input capacity of 1.2 MMBtu/hr, each, using no controls, and exhausting outdoors.

**Plant #6**

(13) Two (2) natural gas-fired radiant solution water heaters, identified as 628H002 and 628H004, constructed prior to 2003, with a maximum heat input capacity of 1.75 and 0.95 MMBtu/hr, respectively, using no controls, and exhausting indoors.

(14) Two (2) natural gas-fired furnaces for drying parts and powder curing, identified as 628L001 and 628L002, constructed prior to 2003, with a maximum heat input capacity of 1.5 and 2.5 MMBtu/hr, respectively, using no controls, and exhausting outdoors.

(15) One (1) natural gas-fired pyrolysis cleaning furnace, identified as 628J001, constructed prior to 2003, with a maximum heat input capacity of 0.95 MMBtu/hr, using a natural gas-fired thermal oxidizer, with a maximum heat input capacity of 0.56 mmBtu/hr as control, and exhausting indoors.

(b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(c) Vessels storing lubricating oils, hydraulic oils, machining oils, or machining fluids.

(d) Filling drums, pails or other packaging containers with lubricating oils, waxes, or greases.

(e) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

**Plant #1**

(1) Four (4) flame cutting stations, constructed prior to 2003, with a maximum metal thickness of 0.6 inches and maximum cutting rate of 5.0 inches per minute, using no controls, and exhausting indoors.

**Plant #3**

(2) Four (4) flame cutting stations, constructed prior to 2003, with a maximum metal thickness of 0.6 inches and maximum cutting rate of 5.0 inches per minute, using

no controls, and exhausting indoors.

(h) Groundwater oil recovery wells.

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(j) Quenching operations used with heat treating processes.

(k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(l) Process vessel degassing and cleaning to prepare for internal repairs.

(m) Paved roads.

(n) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(o) Blowdown for any of the following: sight glass, boiler, compressors, pump and cooling tower.

(p) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

**Plant #1**

(1) One (1) shot peen unit, identified as 123H004, constructed prior to 2003, using a dust collector (123H004) as control, and exhausting outdoors.

(2) One (1) wet grinder, identified as 125F041, constructed prior to 2003, using no controls, and exhausting indoors.

(3) One (1) belt sander, one (1) feeder, two (2) multislides, and one (1) small grinder, identified as BS1, FD1, MS1, MS2, and SG1, respectively, constructed prior to 2003, with a combined maximum throughput of 0.01 pounds per hour, using no controls, and exhausting outdoors.

(4) One (1) bead blast unit, identified as 340H002, constructed prior to 2003, using a dust collector (340X027) as control, and exhausting outdoors.

(5) One (1) wet surface grinder, two (2) surface grinders, one (1) cutoff saw, identified as WG1, SG2, SG3, and CS1, respectively, constructed prior to 2003, with a combined maximum throughput of 0.01 pounds per hour, using no controls, and exhausting indoors.

**Plant #2**

(6) One (1) shot peen unit, identified as 130H012, constructed prior to 2003, using a dust collector (230X024) as control, and exhausting outdoors.

(7) Two (2) cut-off saws, identified as 533U001 and 533U010, constructed prior to

2003, using a mobile dust collector (MDC) as control, and exhausting indoors.

(8) Two (2) grinders, identified as 122F11 and 122F04, constructed prior to 2003, using a dust collector (122X01) as control, and exhausting indoors.

**Plant #3**

(9) One (1) Blanchard wet grinder, identified as 340F027, constructed prior to 2003, using no controls, and exhausting outdoors.

**Plant #5**

(10) One (1) grinder, identified as 550F001, constructed prior to 2003, using a dust collector (550X010) as control, and exhausting outdoors.

(11) One (1) shot peen unit, identified as 550H001, constructed prior to 2003, using a dust collector (550X002) as control, and exhausting indoors.

(12) One (1) shot peen unit, identified as 550H002, constructed prior to 2003, using a dust collector (550X07) as control, and exhausting indoors.

(q) Emission units or activities whose potential uncontrolled VOC emissions meet the exemption levels of three (3) pounds per hour or fifteen (15) pounds per day.

**Plant #1**

(1) Application of water soluble anti-rust solution, identified as WS-72, located in Department 119.

(2) One (1) stamp pad ink application operation, identified as 119G028, constructed prior to 2003, with a maximum throughput of 0.11 pounds per hour, using no controls, and exhausting indoors.

(3) One (1) parts washer, identified as Millwright Department, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

(4) One (1) parts washer, identified as PW-1, located in Department 127, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

(5) One (1) parts washer, identified as PW-2, located in Department 135, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

(6) Three (3) clean-up solvent used in paint booths SCP102, SCP103, and SCP104, with a maximum capacity of 365.0 gallons per year, each, using no controls, and venting outdoors.

(7) One (1) paint operation using dip coating application method.

(8) Two (2) oiling stations.

**Plant #2**

(9) One (1) parts washer, identified as PW-3, located in Plant #2 Maintenance,

constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

**Plant #3**

(10) One (1) parts washer, identified as PW-4, located in Plant #3 Maintenance, constructed prior to 2003, with a maximum throughput of 182.50 gallons per year, using no controls, and exhausting indoors.

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**Plant #5**

(10) One (1) parts washer, identified as PW-5, located in Plant #5 Maintenance, constructed prior to 2003, with a maximum throughput of 182.50 gallons per year, using no controls, and exhausting indoors.

(11) One (1) parts washer, identified as PW-6, located in Rolling Area, approved for construction in 2018, with a maximum capacity of 30.0 gallons per year, using no controls, and exhausting indoors.

(r) The maintenance activities for electric equipment which consumes greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAP.

A.5 FESOP Applicability [326 IAC 2-8-2]

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

## SECTION B GENERAL CONDITIONS

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

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

B.2 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][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 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 proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin 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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F017-39266-00022, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F017-39266-00022 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

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

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

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

(c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

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

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

**Stratospheric Ozone Protection**

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

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

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

**Emissions Unit Description:**

**Plant #1**

(c) One (1) grinding operation, identified as Department 25, and consisting of:

(1) Fifteen (15) grinders, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors. The grinders are identified as the following:

(a) 125F076
(b) 125F070
(c) 125F031
(d) 127F035
(e) 125F022
(f) 127H001
(g) 125F039
(h) 125F027
(i) 125F021
(j) 125F034
(k) 125F023
(l) 125F019
(m) 125F020
(n) 125F044
(o) 125F069

(2) One (1) grinder, identified as 125F057, constructed prior to 2003, using a dust collector (125X031) as control, and exhausting outdoors.

(3) Five (5) grinders, with four (4) constructed prior to 2003 and 336F001 approved in 2018 for construction, using a dust collector (125X030) as control, and exhausting outdoors. The grinders are identified as the following:

(a) 125F055
(b) 125F059
(c) 125F054
(d) 125F056
(e) 336F001

(d) One (1) mixed manufacturing operation, located in Department 27, and consisting of the following:

(1) One (1) cut-off saw, identified as 127U004, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors.

(e) Five (5) shot peen units, located in Department 35, constructed prior to 2003, using a dust collector (533X005) as control, and exhausting outdoors. The shot peen units are identified as the following:

(1) 137H011
(2) 137H012
(3) 137H013

(4) 137H001
(5) 137H010

(f) Two (2) grinders, identified as 127F014 and 127F018, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors.

**Plant #2**

(g) Two (2) grinders, identified as 533F032 and 533F037, approved in 2018 for construction, using a dust collector (230X023) as control, and exhausting outdoors.

(h) Two (2) shot peen units, identified as 230H16 and 230H17, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting outdoors.

(i) Two (2) shot peen units, identified as 533H011 and 230H001, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting to outdoors.

(j) One (1) cut-off saw, identified as 130U010, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting outdoors.

**Plant #3**

(k) Three (3) shot peen units, identified as 336H001, 336H003, and 336H005 approved in 2018 for construction, using a dust collector (336X003) as control and a dust collector (336X002) as backup control, and exhausting outdoors.

(l) Three (3) tandem grinders, identified as 336F007, 336F008, and 336F010, approved in 2018 for construction, using a dust collector (336X003) as control and a dust collector (336X002) as backup control, and exhausting outdoors.

(m) Four (4) OD chamfer grinders, identified as 336F002, 336F003, 336F004, and 336F005, approved in 2018 for construction, using a dust collector (336X002) as control and a dust collector (336X003) as backup control, and exhausting outdoors.

(n) One (1) Fuel Cell operation consisting of the following:

(1) One (1) shot peen unit, identified as 336H004, approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.

(2) Two (2) grinders, identified as 336F006 and 336F007 approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.

(3) One (1) OD chamfer grinder, identified as 336F009, approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.

(o) One (1) wheel grinder, identified as 125F053, approved in 2018 for construction, using a dust collector (336X002) as control, and exhausting outdoors.

**Plant #5:**

(p) One (1) mixed manufacturing operation, located in Department 50, and consisting of the following:

(1) One (1) shot peen unit, identified as 550H005, using a dust collector (550X007) as control, and exhausting indoors.

(2) One (1) shot peen unit, identified as 550H007, using two (2) dust collectors (550X008 and 550X009) as control, and exhausting indoors and outdoors, respectively.

**Insignificant Activities:**

(p) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

**Plant #1**

(1) One (1) shot peen unit, identified as 123H004, constructed prior to 2003, using a dust collector (123H004) as control, and exhausting outdoors.

(4) One (1) bead blast unit, identified as 340H002, constructed prior to 2003, using a dust collector (340X027) as control, and exhausting outdoors.

**Plant #2**

(6) One (1) shot peen unit, identified as 130H012, constructed prior to 2003, using a dust collector (230X024) as control, and exhausting outdoors.

(7) Two (2) cut-off saws, identified as 533U001 and 533U010, constructed prior to 2003, using a mobile dust collector (MDC) as control, and exhausting indoors.

(8) Two (2) grinders, identified as 122F11 and 122F04, constructed prior to 2003, using a dust collector (122X01) as control, and exhausting indoors.

**Plant #5**

(10) One (1) grinder, identified as 550F001, constructed prior to 2003, using a dust collector (550X010) as control, and exhausting outdoors.

(11) One (1) shot peen unit, identified as 550H001, constructed prior to 2003, using a dust collector (550X002) as control, and exhausting indoors.

(12) One (1) shot peen unit, identified as 550H002, constructed prior to 2003, using a dust collector (550X07) as control, and exhausting indoors.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

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

| Control Device | PM Limit (lb/hr) |
|---|---|
| **Plant #1** | |
| 123H004 | 0.09 |
| 125X030 | 2.01 |
| 125X031 | 2.01 |
| 125X032 | 3.50 |
| 533X005 | 1.37 |
| 340X027 | 0.23 |
| **Plant #2** | |
| 122X01 | 0.03 |
| 230X023 | 1.86 |
| 230X024 | 0.26 |
| MDC | 0.33 |
| **Plant #3** | |
| 336X003 | 3.43 |
| 336X002 | 3.43 |
| 336X001 | 0.56 |
| **Plant #5** | |
| 550X07 | 0.20 |
| 550X002 | 0.08 |
| 550X007 | 0.21 |
| 550X008 | 0.13 |
| 550X009 | 0.25 |
| 550X010 | 0.07 |

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

D.1.2 FESOP [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

| Control Device | $PM_{10}$ Limit (lb/hr) | $PM_{2.5}$ Limit (lb/hr) |
|---|---|---|
| **Plant #1** | | |
| 123H004 | 0.09 | 0.09 |
| 125X030 | 2.01 | 2.01 |
| 125X031 | 2.01 | 2.01 |
| 125X032 | 3.50 | 3.50 |
| 533X005 | 1.37 | 1.37 |
| 340X027 | 0.23 | 0.23 |
| **Plant #2** | | |
| 122X01 | 0.03 | 0.03 |
| 230X023 | 1.86 | 1.86 |
| 230X024 | 0.26 | 0.26 |
| MDC | 0.33 | 0.33 |
| **Plant #3** | | |
| 336X003 | 3.43 | 3.43 |
| 336X002 | 3.43 | 3.43 |
| 336X001 | 0.56 | 0.56 |
| **Plant #5** | | |

| | | |
|---|---|---|
| 550X07 | 0.20 | 0.20 |
| 550X002 | 0.08 | 0.08 |
| 550X007 | 0.21 | 0.21 |
| 550X008 | 0.13 | 0.13 |
| 550X009 | 0.25 | 0.25 |
| 550X010 | 0.07 | 0.07 |

Compliance with these limits, combined with the potential to emit $PM_{10}$ and $PM_{2.5}$ from all other emission units at this source, shall limit the source-wide total potential to emit of $PM_{10}$ and $PM_{2.5}$ to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the baghouses controlling the grinding, shot peen, and sawing units shall not exceed the following:

| Control Device | Process Weight (tn/hr) | Emission Limit (lb/hr) |
|---|---|---|
| **Plant #1** | | |
| 123H004 | 0.10 | 0.90 |
| 125X030 | 10.04 | 19.23 |
| 125X031 | 10.04 | 19.23 |
| 125X032 | 22.37 | 32.89 |
| 553X005 | 5.75 | 13.24 |
| 340X027 | 0.44 | 2.35 |
| **Plant #2** | | |
| 122X01 | 0.51 | 2.61 |
| 230X023 | 8.93 | 17.78 |
| 230X024 | 0.51 | 2.61 |
| MDC | 0.74 | 3.36 |
| **Plant #3** | | |
| 336X003 | 21.71 | 32.24 |
| 336X002 | 21.71 | 32.24 |
| 336X001 | 1.56 | 5.52 |
| **Plant #5** | | |
| 550X07 | 9.71 | 18.80 |
| 550X002 | 0.09 | 0.84 |
| 550X007 | 0.39 | 2.18 |
| 550X008 | 5.24 | 12.44 |
| 550X009 | 13.42 | 23.36 |
| 550X010 | 0.07 | 0.69 |

The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10\ P^{0.67}$$

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

**Compliance Determination Requirements [326 IAC 2-8-4(1)]**

D.1.5 Particulate Control

(a) In order to assure compliance with Condition D.1.3, the baghouses for particulate control shall be in operation and control emissions from the grinding, shot peen, and sawing units at all times the facilities are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

(a) Not later than 180 days after the startup of the Plant #3 grinding, shot peen, and sawing units, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouses (336X003, 336X002, and 336X001) controlling the grinding and shot peen units utilizing methods approved by the commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

(b) Not later than 180 days after the issuance date of this permit, Permit No 017-39266-00022, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouses 125X032, 550X07, 550X009 utilizing methods approved by the commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

D.1.7 Visible Emissions Notations

(a) Visible emission notations of the baghouses (123H004, 125X030, 125X031, 125X032, 533X005, 340X027, 230X023, 230X024, 336X003, 336X002, 336X001, 550X009, and 550X010) exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses (122X01, MDC, 550X07, 550X002, 550X007, and 550X008) at least once per day when the associated grinding, shot peen, and sawing units are in operation. The normal ranges for these units are:

(a)

| Control Device | Range |
|---|---|
| **Plant #2** | |
| 122X01 | 0.5 to 3.0 inches |
| MDC | 0.5 to 3.0 inches |
| **Plant #5** | |
| 550X07 | 0.5 to 3.0 inches |
| 550X002 | 0.5 to 3.0 inches |
| 550X007 | 0.5 to 3.0 inches |
| 550X008 | 0.5 to 3.0 inches |

(b) or a range established during the latest stack test.

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

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

D.1.9 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

D.1.10 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the visible emission notations of the baghouses exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the pressure drop across the baghouses. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

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

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

**Insignificant Activities:**

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

**Plant #1**

(1) Two (2) natural gas-fired ovens, identified as 135L003 and 135L009, constructed prior to 2003, with a maximum heat input capacity of 0.53 and 1.0 MMBtu/hr, respectively, using no controls, and exhausting outdoors.

(2) One (1) natural gas-fired oven, identified as 135L008, constructed prior to 2003, with a maximum heat input capacity of 0.18 MMBtu/hr, using no controls, and exhausting outdoors.

(3) One (1) natural gas-fired oven, identified as 135L007, constructed prior to 2003, with a maximum heat input capacity of 0.5 MMBtu/hr, using no controls, and exhausting outdoors.

(4) One (1) natural gas-fired annealing furnace, identified as 352L010, constructed prior to 2003, with a maximum heat input capacity of 0.20 MMBtu/hr, using no controls, and exhausting outdoors.

(5) One (1) natural gas-fired oven, identified as OV-1, approved in 2018 for construction, with a maximum heat input capacity of 2.0 MMBtu/hr, using no controls, and exhausting outdoors.

**Plant #2**

(6) Two (2) natural gas-fired furnaces, identified as 330L010 and 330K012, constructed prior to 2003, with a maximum heat input capacity of 1.0 MMBtu/hr, each, using no controls, and exhausting indoors.

(7) Three (3) natural gas-fired bar furnaces, identified as 130J017, 533J016, and 130J011, constructed prior to 2003, with a maximum heat input capacity of 2.0, 1.5, and 4.1 MMBtu/hr, respectively, using no controls, and exhausting outdoors.

(8) Three (3) natural gas-fired draw furnaces, identified as 130L026, 533L021, and 533L020, constructed prior to 2003, with a maximum heat input capacity of 2.0, 1.0, and 0.8 MMBtu/hr, respectively, using no controls, and exhausting indoors.

(9) Two (2) natural gas-fired furnaces, identified as 130J024 and 533J025, constructed prior to 2003, with a maximum heat input capacity of 3.0 MMBtu/hr, each, using no controls, and exhausting outdoors.

**Plant #3**

(10) One (1) natural gas-fired heat stress oven, identified as 336L002, approved in 2018 for construction, with a maximum heat input capacity of 2.0 MMBtu/hr, using no controls, and exhausting outdoors.

(11) Two (2) make-up air units, identified as 336H001 and 336H002, approved for construction in 2018, with a maximum heat input capacity of 0.50 MMBtu/hr, each, using no controls, and exhausting outdoors.

**Plant #5**

(12) Three (3) natural gas-fired furnaces, identified as 550L001, 550L003, 550L005 constructed in 1998, 2001, and 2003, respectively, with a maximum heat input capacity of 1.2 MMBtu/hr, each, using no controls, and exhausting outdoors.

**Plant #6**

(13) Two (2) natural gas-fired radiant solution water heaters, identified as 628H002 and 628H004, constructed prior to 2003, with a maximum heat input capacity of 1.75 and 0.95 MMBtu/hr, respectively, using no controls, and exhausting indoors.

(14) Two (2) natural gas-fired furnaces for drying parts and powder curing, identified as 628L001 and 628L002, constructed prior to 2003, with a maximum heat input capacity of 1.5 and 2.5 MMBtu/hr, respectively, using no controls, and exhausting outdoors.

(15) One (1) natural gas-fired pyrolysis cleaning furnace, identified as 628J001, constructed prior to 2003, with a maximum heat input capacity of 0.95 MMBtu/hr, using a natural gas-fired thermal oxidizer, with a maximum heat input capacity of 0.56 mmBtu/hr as control, and exhausting indoors.

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

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

D.2.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

| Emission Unit | Unit ID | Pt (lb/MMBtu) |
|---|---|---|
| Natural Gas-fired Furnace | 550L001 | 0.60 |
| Natural Gas-fired Furnace | 550L003 | |
| Natural Gas-fired Oven | 135L003 | 0.44 |
| Natural Gas-fired Oven | 135L009 | |
| Natural Gas-fired Oven | 135L008 | |
| Natural Gas-fired Oven | 135L007 | |
| Natural Gas-fired Annealing Furnace | 352L010 | |
| Natural Gas-fired | 330L010 | |

| | | |
|---|---|---|
| Furnace | | |
| Natural Gas-fired Furnace | 330K012 | |
| Natural Gas-fired Bar Furnace | 130J17 | |
| Natural Gas-fired Bar Furnace | 130J16 | |
| Natural Gas-fired Bar Furnace | 130J11 | |
| Natural Gas-fired Draw Furnace | 130L026 | |
| Natural Gas-fired Draw Furnace | 533L021 | |
| Natural Gas-fired Draw Furnace | 533L020 | |
| Natural Gas-fired Furnace | 533J024 | |
| Natural Gas-fired Furnace | 533J025 | |
| Natural Gas-fired Water Heater | 628H002 | |
| Natural Gas-fired Water Heater | 628H004 | |
| Natural Gas-fired Furnace | 628L001 | |
| Natural Gas-fired Furnace | 628L002 | |
| Natural Gas-fired Furnace | 628J001 | |
| Natural Gas-fired Thermal Oxidizer | 628J001 | |
| Natural Gas-fired Furnace | 550L005 | |
| Natural Gas-fired Oven | 336L002 | 0.42 |
| Natural Gas-fired Make Up Air Unit | 336H001 | |
| Natural Gas-fired Make Up Air Unit | 336H002 | |
| Natural Gas-fired Oven | OV-1 | |

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

**Emission Unit:**

(1) One (1) clean-up solvent used in paint booth SCP 101, with a maximum capacity of 1825.0 gallons per year, using no controls, and exhausting outdoors.

**Insignificant Activities:**

(q) Emission units or activities whose potential uncontrolled VOC emissions meet the exemption levels of three (3) pounds per hour or fifteen (15) pounds per day.

**Plant #1**

(1) Application of water soluble anti-rust solution, identified as WS-72, located in Department 119.

(2) One (1) stamp pad ink application operation, identified as 119G028, constructed prior to 2003, with a maximum throughput of 0.11 pounds per hour, using no controls, and exhausting indoors.

(3) One (1) parts washer, identified as Millwright Department, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

(4) One (1) parts washer, identified as PW-1, located in Department 127, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

(5) One (1) parts washer, identified as PW-2, located in Department 135, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

(6) Three (3) clean-up solvent used in paint booths SCP102, SCP103, and SCP104, with a maximum capacity of 365.0 gallons per year, each, using no controls, and venting outdoors.

(7) One (1) paint operation using dip coating application method.

(8) Two (2) oiling stations.

**Plant #2**

(9) One (1) parts washer, identified as PW-3, located in Plant #2 Maintenance, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

**Plant #3**

(10) One (1) parts washer, identified as PW-4, located in Plant #3 Maintenance, constructed prior to 2003, with a maximum throughput of 182.50 gallons per year, using no controls, and exhausting indoors.

.

**Plant #5**

(10) One (1) parts washer, identified as PW-5, located in Plant #5 Maintenance, constructed prior to 2003, with a maximum throughput of 182.50 gallons per year, using no controls, and exhausting indoors.

(11) One (1) parts washer, identified as PW-6, located in Rolling Area, approved for construction in 2018, with a maximum capacity of 30.0 gallons per year, using no controls, and exhausting indoors.

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

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

D.3.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

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

(a) Ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.
(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:
(A) must be a solid, fluid stream; and
(B) shall be applied at a pressure that does not cause excessive splashing.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

D.3.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

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

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

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

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

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

**SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS**

**Emission Unit:**

(b) Three (3) dip coating units applying paint to steel springs, identified as SCP102, SCP103, and SCP104, approved in 2018 for construction, applied using a paint tumbler, with a maximum capacity of 0.0003 gallons per unit and 1000.0 units per hour, each, using no controls, and venting outdoors.

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

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

D.4.1 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]

In order to render the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations) not applicable, the VOC input to the dip coating units (SCP102, SCP103, and SCP104) shall be less than fifteen (15) pounds per day of VOC, each, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit shall render the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations) not applicable. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC content and usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this permit 017-39266-00022.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC input limitations contained in Condition D.4.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal.

(e) The VOC input for a month shall be calculated using the following equation:

$$\text{VOC}\,input = \text{SCL} - \text{SR}$$

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

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

D.4.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.4.1.

(1) The VOC content of each coating material and solvent used.

(2) The amount of each coating material and solvent used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total VOC input to the dip coating units (SCP102, SCP103, and SCP104), including coating, dilution solvents, and cleaning solvents, for each day.

(4) If the amount of VOC in waste material is being deducted from the VOC input as allowed in paragraph (b) of Condition D.4.2, then the following records shall be maintained:

(A) The amount of VOC containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.

(C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.

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

D.4.5 Reporting Requirements

A quarterly report of the VOC input and a quarterly summary of the information to document the compliance status with D.4.1 and D.4.3 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition.

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

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

**FESOP Usage Report**

(Submit Report Quarterly)

Source Name: Matthew-Warren, Inc.
Source Address: 500 E. Ottawa St., Logansport, Indiana 46947
FESOP Permit No.: 017-39266-00022
Facility: SCP102, SCP103, and SCP104
Parameter: VOC Input
Limit: The VOC input to the dip coating units (SCP102, SCP103, and SCP104) shall be less than fifteen (15) pounds per day of VOC, each, including coatings, dilution solvents, and cleaning solvents.

**Month: _____ Year: _____**

| Day | | Day | |
|---|---|---|---|
| 1 | | 17 | |
| 2 | | 18 | |
| 3 | | 19 | |
| 4 | | 20 | |
| 5 | | 21 | |
| 6 | | 22 | |
| 7 | | 23 | |
| 8 | | 24 | |
| 9 | | 25 | |
| 10 | | 26 | |
| 11 | | 27 | |
| 12 | | 28 | |
| 13 | | 29 | |
| 14 | | 30 | |
| 15 | | 31 | |
| 16 | | | |

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on_____

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

*INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT*

# OFFICE OF AIR QUALITY
# COMPLIANCE AND ENFORCEMENT BRANCH

## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Matthew Warren, Inc.
Source Address: 500 E. Ottawa St., Logansport, Indiana 46947
FESOP Permit No.: F017-39266-00022

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Matthew Warren, Inc.
Source Address: 500 E. Ottawa St., Logansport, Indiana 46947
FESOP Permit No.: F017-39266-00022

**This form consists of 2 pages** **Page 1 of 2**

| |
|---|
| □ This is an emergency as defined in 326 IAC 2-7-1(12)<br>• The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and<br>• The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12 |

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N<br>Describe: |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Source Name: Matthew Warren, Inc.
Source Address: 500 E. Ottawa St., Logansport, Indiana 46947
FESOP Permit No.: F017-39266-00022

**Months: _____ to _____ Year: _____**



This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

# Technical Support Document (TSD) for a Federally Enforceable State Operating Permit Renewal with New Source Review

## Source Description and Location

| | |
|---|---|
| **Source Name:** | **Matthew Warren, Inc.** |
| **Source Location:** | **Plants #1 and #3 - 500 E. Ottawa St., Logansport, IN 46947**<br>**Plant #2 - 300 E. Miami Ave., Logansport, IN 46947**<br>**Plant #5 - 801 Bates St., Logansport, IN 46947**<br>**Plant #6 - 131 Godfrey St., Logansport, IN 46947** |
| **County:** | **Cass** |
| **SIC Code:** | **3495 (Wire Springs)** |
| **Permit Renewal w/ NSR No.:** | **F 017-39266-00022** |
| **Permit Reviewer:** | **Ethan Horvath** |

On November 8, 2017, Matthew Warren, Inc. submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. On June 21, 2018, Matthew Warren, Inc. submitted an application to the Office of Air Quality (OAQ) related to a revision to an existing stationary steel spring manufacturing source. OAQ has reviewed the operating permit renewal and revision applications from Matthew Warren, Inc. Matthew Warren, Inc. was issued its second FESOP Renewal (F017-26357-00022) on August 5, 2008.

## Source Definition

This source consists of the following plants:

(a) Plants #1 and #3 are located at 500 E. Ottawa St. Logansport, Indiana 46947;
(b) Plant #2 is located at 300 E. Miami Ave., Logansport, IN 46947;
(c) Plant #5 is located at 801 Bates Street, Logansport, IN 46947, and
(d) Plant #6 is located at 131 Godfrey St., Logansport, IN 46947;

In order to consider all plants as one single source, all three of the following criteria must be met:

(1) The plants must have common ownership/control;
(2) The plants must have the same SIC code; and
(3) The plants must be located on contiguous or adjacent properties.

These plants are located on adjacent properties, have the same SIC codes of 3495 and are under common control, therefore they will be considered one (1) source, as defined by 326 IAC 2-7-1(22). This was initially determined in the FESOP 017-16766-00022, issued on December 30, 2003. Additionally, after consulting with the source it was determined that the plant issued Exemption 017-16750-00044, on March 11, 2003 will be combined with this FESOP and considered one single source. This plant will be known as Plant #6 located at 131 Godfrey St., Logansport, IN 46947.

## Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

**Plant #1:**

(a) One (1) dip, brush, and roll coating booth applying paints and inks to steel springs and miscellaneous metal parts, identified as SCP101, constructed in 1952, with a maximum capacity of 0.016 gallons per unit and 66.0 units per hour, using no controls, exhausting outdoors.

(1) One (1) clean-up solvent used in paint booth SCP 101, with a maximum capacity of 1825.0 gallons per year, using no controls, and exhausting outdoors.

(b) One (1) grinding operation, identified as Department 25, and consisting of:

(1) Fifteen (15) grinders, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors. The grinders are identified as the following:

(a) 125F076
(b) 125F070
(c) 125F031
(d) 127F035
(e) 125F022
(f) 127H001
(g) 125F039
(h) 125F027
(i) 125F021
(j) 125F034
(k) 125F023
(l) 125F019
(m) 125F020
(n) 125F044
(o) 125F069

(2) One (1) grinder, identified as 125F057, constructed prior to 2003, using a dust collector (125X031) as control, and exhausting outdoors.

(3) Five (5) grinders, with four (4) constructed prior to 2003 and 336F001 approved in 2018 for construction, using a dust collector (125X030) as control, and exhausting outdoors. The grinders are identified as the following:

(a) 125F055
(b) 125F059
(c) 125F054
(d) 125F056
(e) 336F001

(c) One (1) mixed manufacturing operation, located in Department 27, and consisting of the following:

(1) One (1) cut-off saw, identified as 127U004, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors.

(d) Five (5) shot peen units, located in Department 35, constructed prior to 2003, using a dust collector (533X005) as control, and exhausting outdoors. The shot peen units are identified as the following:

(1) 137H011
(2) 137H012
(3) 137H013

(4) 137H001
(5) 137H010

(e) Two (2) grinders, identified as 127F014 and 127F018, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors.

**Plant #2:**

(f) Two (2) grinders, identified as 533F032 and 533F037, constructed in 1960, using a dust collector (230X023) as control, and exhausting outdoors.

(g) Two (2) shot peen units, identified as 230H16 and 230H17, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting outdoors.

(h) Two (2) shot peen units, identified as 533H011 and 230H001, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting to outdoors.

(i) One (1) cut-off saw, identified as 130U010, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting outdoors.

**Plant #5**

(j) One (1) mixed manufacturing operation, located in Department 50, constructed prior to 2003, and consisting of the following:

(1) One (1) shot peen unit, identified as 550H005, using a dust collector (550X007) as control, and exhausting indoors.

(2) One (1) shot peen unit, identified as 550H007, using two (2) dust collectors (550X008 and 550X009) as control, and exhausting indoors and outdoors, respectively.

**Plant #6:**

(k) One (1) powder coating application system used for electrostatic spray application of dry epoxy powder to coiled steel springs, identified as 628S00P, constructed prior to 2003, with a maximum capacity of 0.00008 pounds per unit and 2,220 units per hour, using an integral dry cartridge filter as control, and exhausting outdoors.

**Emission Units and Pollution Control Equipment Removed From the Source**

The source has removed the following emission units:

(a) One (1) segment, identified as SCP103, installed in 1952, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through two (2) stacks (ID #'s S103A and S103B).

(b) One (1) segment, identified as SCP102, installed in 1952, for marking steel springs with a rollcoater or stamper, and exhausting through two (2) stacks (ID #'s S102A and S102B).

(c) One (1) segment in Plant #3, identified as SCP301, where steel T-bar ends are dipped into a small dip tank for identification coating and then put onto a rack to air dry.

(d) One (1) natural gas fired stress relief oven rated at 0.8 MMBtu/hr.

(e) One (1) natural gas fired furnaces located under the heat treat department at Plant #2, rated at 1.0 MMBtu/hr.

(f) Two (2) natural gas fired ovens (135L005 and 135L001) located under Department 123 at Plant #1, each rated at 0.8 and 0.53 MMBtu/hr.

(g) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101), installed in 1951.

(h) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103), installed in 1951.

(i) One (1) operation identified as Department 119 (segment 1) consisting of a shot peen unit identified as 123H004 (GP105), installed in 1980, controlled by the dust collector and exhausting inside the building.

(j) One (1) operation identified as hot coil department consisting of the following:

(1) One (1) shot peen unit identified as 533H011 and controlled by a dust collector 230x024 (GP202), installed in 1960.

(2) One (1) shot peen unit identified as 30H12 controlled by a dust collector 230x024 (GP202), installed in 1960, and two (2) spring presses.

(3) Two (2) hand grinders controlled by a dust collector identified as 233x023 (GP201), installed in 1960.

(4) Two (2) abrasive saws controlled by drum dust collector.

(k) One (1) GM torque rod line consisting of the following:

(1) One (1) nylon spraying operation controlled by cartridge filter capturing particulates.

(2) One (1) paint application operation (F78WX) using dipping application method.

(l) Two (2) natural gas fired furnaces (K30 and L20) located under the heat treat department at Plant #2, each rated at 4.2 and 1.2 MMBtu/hr.

(m) Three (3) natural gas fired furnaces located under the heat treat department at Plant #2, each rated at 1.0 MMBtu/hr.

(n) One (1) natural gas fired stress relief oven rated at 0.8 MMBtu/hr, located at Plant #3.

(o) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101), installed in 1951.

(p) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103), installed in 1951.

(q) Three (3) of the grinders controlled by a dust collector identified as 125x031 (GP102), installed in 1951

(r) Two (2) natural gas-fired furnaces, identified as 533J024 and 533J025, approved for constructed in 2018, with a maximum heat input capacity of 3.0 MMBtu/hr, each, using no controls, and exhausting indoors.

**Insignificant Activities**

The source also consists of the following insignificant activities:

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

**Plant #1**

(1) Two (2) natural gas-fired ovens, identified as 135L003 and 135L009, constructed prior to 2003, with a maximum heat input capacity of 0.53 and 1.0 MMBtu/hr, respectively, using no controls, and exhausting outdoors.

(2) One (1) natural gas-fired oven, identified as 135L008, constructed prior to 2003, with a maximum heat input capacity of 0.18 MMBtu/hr, using no controls, and exhausting outdoors.

(3) One (1) natural gas-fired oven, identified as 135L007, constructed prior to 2003, with a maximum heat input capacity of 0.5 MMBtu/hr, using no controls, and exhausting outdoors.

(4) One (1) natural gas-fired annealing furnace, identified as 352L010, constructed prior to 2003, with a maximum heat input capacity of 0.20 MMBtu/hr, using no controls, and exhausting outdoors.

**Plant #2**

(4) Two (2) natural gas-fired furnaces, identified as 330L010 and 330K012, constructed prior to 2003, with a maximum heat input capacity of 1.0 MMBtu/hr, each, using no controls, and exhausting indoors.

(5) Three (3) natural gas-fired bar furnaces, identified as 130J017, 533J016, and 130J011, constructed prior to 2003, with a maximum heat input capacity of 2.0, 1.5, and 4.1 MMBtu/hr, respectively, using no controls, and exhausting outdoors.

(6) Three (3) natural gas-fired draw furnaces, identified as 130L026, 533L021, and 533L020, constructed prior to 2003, with a maximum heat input capacity of 2.0, 1.0, and 0.8 MMBtu/hr, respectively, using no controls, and exhausting indoors.

(7) Two (2) natural gas-fired furnaces, identified as 130J024 and 533J025, constructed prior to 2003, with a maximum heat input capacity of 3.0 MMBtu/hr, each, using no controls, and exhausting outdoors.

**Plant #5**

(9) Three (3) natural gas-fired furnaces, identified as 550L001, 550L003, 550L005 constructed in 1998, 2001, and 2003, respectively, with a maximum heat input capacity of 1.2 MMBtu/hr, each, using no controls, and exhausting outdoors.

**Plant #6**

(10) Two (2) natural gas-fired radiant solution water heaters, identified as 628H002 and 628H004, constructed prior to 2003, with a maximum heat input capacity of 1.75 and 0.95 MMBtu/hr, respectively, using no controls, and exhausting indoors.

(11) Two (2) natural gas-fired furnaces for drying parts and powder curing, identified as 628L001 and 628L002, constructed prior to 2003, with a maximum heat input capacity of 1.5 and 2.5 MMBtu/hr, respectively, using no controls, and exhausting outdoors.

(12) One (1) natural gas-fired pyrolysis cleaning furnace, identified as 628J001, constructed prior to 2003, with a maximum heat input capacity of 0.95 MMBtu/hr, using a natural gas-fired thermal oxidizer, with a maximum heat input capacity of 0.56 mmBtu/hr as control, and exhausting indoors.

(c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(d) Vessels storing lubricating oils, hydraulic oils, machining oils, or machining fluids.

(e) Filling drums, pails or other packaging containers with lubricating oils, waxes, or greases.

(f) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

**Plant #1**

(1) Four (4) flame cutting stations, constructed prior to 2003, with a maximum metal thickness of 0.6 inches and maximum cutting rate of 5.0 inches per minute, using no controls, and exhausting indoors.

**Plant #3**

(2) Four (4) flame cutting stations, constructed prior to 2003, with a maximum metal thickness of 0.6 inches and maximum cutting rate of 5.0 inches per minute, using no controls, and exhausting indoors.

(i) Groundwater oil recovery wells.

(j) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(k) Quenching operations used with heat treating processes.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(m) Process vessel degassing and cleaning to prepare for internal repairs.

(n) Paved roads.

(o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(p) Blowdown for any of the following: sight glass, boiler, compressors, pump and cooling tower.

(q) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

**Plant #1**

(1) One (1) shot peen unit, identified as 123H004, constructed prior to 2003, using a dust collector (123H004) as control, and exhausting outdoors.

(2) One (1) wet grinder, identified as 125F041, constructed prior to 2003, using no controls, and exhausting indoors.

(3) One (1) belt sander, one (1) feeder, two (2) multislides, and one (1) small grinder, identified as BS1, FD1, MS1, MS2, and SG1, respectively, constructed prior to 2003, with a combined maximum throughput of 0.01 pounds per hour, using no controls, and exhausting outdoors.

(4) One (1) bead blast unit, identified as 340H002, constructed prior to 2003, using a dust collector (340X027) as control, and exhausting outdoors.

(5) One (1) wet surface grinder, two (2) surface grinders, one (1) cutoff saw, identified as WG1, SG2, SG3, and CS1, respectively, constructed prior to 2003, with a combined maximum throughput of 0.01 pounds per hour, using no controls, and exhausting indoors.

**Plant #2**

(6) One (1) shot peen unit, identified as 130H012, constructed prior to 2003, using a dust collector (230X024) as control, and exhausting outdoors.

(7) Two (2) cut-off saws, identified as 533U001 and 533U010, constructed prior to 2003, using a mobile dust collector (MDC) as control, and exhausting indoors.

(8) Two (2) grinders, identified as 122F11 and 122F04, constructed prior to 2003, using a dust collector (122X01) as control, and exhausting indoors.

**Plant #3**

(9) One (1) Blanchard wet grinder, identified as 340F027, constructed prior to 2003, using no controls, and exhausting outdoors.

**Plant #5**

(10) One (1) grinder, identified as 550F001, constructed prior to 2003, using a dust collector (550X010) as control, and exhausting outdoors.

(11) One (1) shot peen unit, identified as 550H001, constructed prior to 2003, using a dust collector (550X002) as control, and exhausting indoors.

(12) One (1) shot peen unit, identified as 550H002, constructed prior to 2003, using a dust collector (550X07) as control, and exhausting indoors.

(r) Emission units or activities whose potential uncontrolled VOC emissions meet the exemption levels of three (3) pounds per hour or fifteen (15) pounds per day.

**Plant #1**

(1) Application of water soluble anti-rust solution, identified as WS-72, located in Department 119.

(2) One (1) stamp pad ink application operation, identified as 119G028, constructed prior to 2003, with a maximum throughput of 0.11 pounds per hour, using no controls, and exhausting indoors.

(3) One (1) parts washer, identified as Millwright Department, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

(4) One (1) parts washer, identified as PW-1, located in Department 127, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

(5) One (1) parts washer, identified as PW-2, located in Department 135, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

(6) One (1) paint operation using dip coating application method.

(7) Two (2) oiling stations.

**Plant #2**

(8) One (1) parts washer, identified as PW-3, located in Plant #2 Maintenance, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.

**Plant #3**

(9) One (1) parts washer, identified as PW-4, located in Plant #3 Maintenance, constructed prior to 2003, with a maximum throughput of 182.50 gallons per year, using no controls, and exhausting indoors.

**Plant #5**

(10) One (1) parts washer, identified as PW-5, located in Plant #5 Maintenance, constructed prior to 2003, with a maximum throughput of 182.50 gallons per year, using no controls, and exhausting indoors.

(s) The maintenance activities for electric equipment which consumes greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAP.

## Existing Approvals

The source was issued FESOP Renewal No. F 017-26357-00022 on August 5, 2008. The source has since received the following approval:

Administrative Amendment No. 017-28382-00022 on September 11, 2009.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

## "Integral Part of the Process" Determination

On August 26, 2009, the Permittee submitted information requesting that the dry cartridge filter, identified as 280PC01, be considered integral to the process for the powder coating application system operation. IDEM, OAQ evaluated the justifications and agreed that the dry cartridge filter will be considered integral to the process. This evaluation and approval was discussed in Administrative Amendment No. 017-26357-00022, issued on September 11, 2009.

As part of Administrative Amendment No. 017-26357-00022, issued on September 11, 2009, IDEM, OAQ previously determined that the dry cartridge filter is an integral part of the powder coating application system.

IDEM, OAQ is not reevaluating this integral justification at this time. Therefore, the potential PM, PM10, and PM2.5 emissions from the powder coating application system will continue to be calculated after consideration of the dry cartridge filter for purposes of determining permitting level and 326 IAC 6-3 applicability. Operating conditions in the proposed permit will specify that the dry cartridge filter shall operate at all times when the powder coating application system is in operation.

## Enforcement Issue

There are no pending enforcement actions related to this Renewal with New Source Review

## Emission Calculations

See Appendix A of this document for detailed emission calculations.

## County Attainment Status

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

(c) Other Criteria Pollutants
Cass County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants 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.

**Greenhouse Gas (GHG) Emissions**

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

| Unrestricted Potential Emissions | |
|---|---|
| Pollutant | Tons/year |
| PM | Greater than 100 |
| $PM_{10}$ | Greater than 100 |
| $PM_{2.5}$ | Greater than 100 |
| $SO_2$ | Less than 100 |
| $NO_x$ | Less than 100 |
| VOC | Less than 100 |

| Unrestricted Potential Emissions | |
|---|---|
| Pollutant | Tons/year |
| CO | Less than 100 |
| Single HAP | Less than 10 |
| Total HAP | Less than 25 |

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM, PM10, and PM2.5 is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM10, and PM2.5 emissions to less than Title V levels; therefore, the Permittee will be issued a FESOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year.

## Description of Proposed Revision

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Matthew Warren, Inc. on June 21, 2018 relating to the construction of three (3) surface coating booths, three (3) clean-up operations for surface coating booths, two (2) natural gas-fired ovens, four (4) shot peen units, thirteen (13) grinders, one (1) parts washer, and two (2) natural gas-fired make-up air units.

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

**Plant #1**

(a) Three (3) dip coating units applying paint to steel springs, identified as SCP102, SCP103, and SCP104, approved in 2018 for construction, applied using a paint tumbler, with a maximum capacity of 0.0003 gallons per unit and 1000.0 units per hour, each, using no controls, and venting outdoors.

(b) One (1) natural gas-fired oven, identified as OV-1, approved in 2018 for construction, with a maximum heat input capacity of 2.0 MMBtu/hr, using no controls, and exhausting outdoors.

**Plant #2**

(c) Two (2) grinders, identified as 533F032 and 533F037, approved in 2018 for construction, using a dust collector (230X023) as control, and exhausting outdoors.

**Plant #3**

(d) Three (3) shot peen units, identified as 336H001, 336H003, and 336H005 approved in 2018 for construction, using a dust collector (336X003) as control and a dust collector (336X002) as backup control, and exhausting outdoors.

(e) Three (3) tandem grinders, identified as 336F007, 336F008, and 336F010, approved in 2018 for construction, using a dust collector (336X003) as control and a dust collector (336X002) as backup control, and exhausting outdoors.

(f) Four (4) OD chamfer grinders, identified as 336F002, 336F003, 336F004, and 336F005, approved in 2018 for construction, using a dust collector (336X002) as control and a dust collector (336X003) as backup control, and exhausting outdoors.

(g) One (1) Fuel Cell operation consisting of the following:

(1) One (1) shot peen unit, identified as 336H004, approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.

(2) Two (2) grinders, identified as 336F006 and 336F007 approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.

(3) One (1) OD chamfer grinder, identified as 336F009, approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.

(h) One (1) natural gas-fired heat stress oven, identified as 336L002, approved in 2018 for construction, with a maximum heat input capacity of 2.0 MMBtu/hr, using no controls, and exhausting outdoors.

(i) Two (2) make-up air units, identified as 336H001 and 336H002, approved for construction in 2018, with a maximum heat input capacity of 0.50 MMBtu/hr, each, using no controls, and exhausting outdoors.

(j) Three (3) clean-up solvent used in paint booths SCP102, SCP103, and SCP104, with a maximum capacity of 365.0 gallons per year, each, using no controls, and venting outdoors.

(k) One (1) wheel grinder, identified as 125F053, approved in 2018 for construction, using a dust collector (336X002) as control, and exhausting outdoors.

**Plant #5**

(l) One (1) parts washer, identified as PW-6, located in Rolling Area, approved for construction in 2018, with a maximum capacity of 30.0 gallons per year, using no controls, and exhausting indoors.

**Permit Level Determination - FESOP Revision**

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

| Process/ Emission Unit | PTE of Proposed Revision (tons/year) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | **PM*** | **PM10** | **PM2.5**** | **$SO_2$** | **NOx** | **VOC** | **CO** | **Single HAP***** | **Combined HAPs** |
| Surface Coating | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 15.49 | 0.00 | 0.00 | 0.00 |
| Degreasing | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 3.78 | 0.00 | 0.00 | 0.00 |
| Grinding, Shot Peen, and Sawing | 324.75 | 324.75 | 324.75 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

| Process/ Emission Unit | PTE of Proposed Revision (tons/year) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | **PM*** | **PM10** | **PM2.5**** | **$SO_2$** | **NOx** | **VOC** | **CO** | **Single HAP***** | **Combined HAPs** |
| Natural Gas Combustion | 0.04 | 0.16 | 0.16 | 0.01 | 2.15 | 0.12 | 1.80 | 0.04 (Hexane) | 0.04 |
| **Total PTE of Proposed Revision** | **324.79** | **324.91** | **324.91** | **0.01** | **2.15** | **19.39** | **1.80** | **0.04 (Hexane)** | **0.04** |

negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant."
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
***Single highest source-wide HAP.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision, which has been incorporated into the Renewal as a FESOP with New Source Review, because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit greater than or equal to twenty-five (25) tons per year of the following pollutants:

(i) PM, PM10, or direct PM2.5.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process/ Emission Unit | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | PM | $PM_{10}$* | $PM_{2.5}$** | $SO_2$ | $NO_x$ | VOC | CO | Total HAPs | Worst Single HAP |
| Surface Coating | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 28.54 | 0.00 | 0.00 | 0.00 |
| Degreasing | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 12.69 | 0.00 | 0.00 | 0.00 |
| Grinding, Shot Peen, and Sawing | 87.59 | 87.59 | 87.59 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Natural Gas Combustion | 0.32 | 1.26 | 1.26 | 0.10 | 16.58 | 0.91 | 13.93 | 0.31 | 0.30 (Hexane) |
| Powder Coating | 5.83E-04 | 5.83E-04 | 5.83E-04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Flame Cutting | 1.02 | 1.02 | 1.02 | 0.00 | 0.00 | 0.00 | 0.00 | 5.68E-03 | 3.15E-03 (Manganese) |
| Ink Stamping | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.36 | 0.00 | 0.00 | 0.00 |
| Insignificant Activities | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 3.00 | 1.00 | 1.00 | 1.00 (PAH) |
| Storage Vessels | 1.00 | 1.00 | 1.00 | 0.00 | 0.00 | 1.00 | 0.00 | 1.00 | 1.00 (PAH) |
| **Total PTE of Entire Source** | **90.93** | **91.88** | **91.88** | **1.10** | **17.58** | **46.78** | **14.93** | **2.32** | **2.00 (PAH)** |

| Process/ Emission Unit | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | PM | $PM_{10}$* | $PM_{2.5}$** | $SO_2$ | $NO_x$ | VOC | CO | Total HAPs | Worst Single HAP |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 25 | 10 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | NA | NA |
| Fugitive Emissions | 0.78 | 0.16 | 0.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

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

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

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

(1) Criteria Pollutants
In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

(A)

| Control Device | $PM_{10}$ Limit (lb/hr) | $PM_{2.5}$ Limit (lb/hr) |
|---|---|---|
| **Plant #1** | | |
| 123H004 | 0.09 | 0.09 |
| 125X030 | 2.01 | 2.01 |
| 125X031 | 2.01 | 2.01 |
| 125X032 | 3.50 | 3.50 |
| 533X005 | 1.37 | 1.37 |
| 340X027 | 0.23 | 0.23 |
| **Plant #2** | | |
| 122X01 | 0.03 | 0.03 |
| 230X023 | 1.86 | 1.86 |
| 230X024 | 0.26 | 0.26 |
| MDC | 0.33 | 0.33 |
| **Plant #3** | | |
| 336X003 | 3.43 | 3.43 |

| | | |
|---|---|---|
| 336X002 | 3.43 | 3.43 |
| 336X001 | 0.56 | 0.56 |
| **Plant #5** | | |
| 550X07 | 0.20 | 0.20 |
| 550X002 | 0.08 | 0.08 |
| 550X007 | 0.21 | 0.21 |
| 550X008 | 0.13 | 0.13 |
| 550X009 | 0.25 | 0.25 |
| 550X010 | 0.07 | 0.07 |

Compliance with these limits, combined with the potential to emit $PM_{10}$ and $PM_{2.5}$ from all other emission units at this source, shall limit the source-wide total potential to emit of $PM_{10}$ and $PM_{2.5}$ to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(d) PSD Minor Source – PM

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

(1)

| Control Device | PM Limit (lb/hr) |
|---|---|
| **Plant #1** | |
| 123H004 | 0.09 |
| 125X030 | 2.01 |
| 125X031 | 2.01 |
| 125X032 | 3.50 |
| 533X005 | 1.37 |
| 340X027 | 0.23 |
| **Plant #2** | |
| 122X01 | 0.03 |
| 230X023 | 1.86 |
| 230X024 | 0.26 |
| MDC | 0.33 |
| **Plant #3** | |
| 336X003 | 3.43 |
| 336X002 | 3.43 |
| 336X001 | 0.56 |
| **Plant #5** | |
| 550X07 | 0.20 |
| 550X002 | 0.08 |
| 550X007 | 0.21 |
| 550X008 | 0.13 |
| 550X009 | 0.25 |
| 550X010 | 0.07 |

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per

twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**Federal Rule Applicability**

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

**New Source Performance Standards (NSPS)**

(a) The requirements of the New Source Performance Standard for Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db and 326 IAC 12, are not included in the permit for the natural gas-fired units, since the natural gas-fired units do not have a heat input capacity greater than 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)), each.

(b) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for the natural gas-fired units, since the natural gas-fired units have a maximum design heat input capacity less than 2.9 MW (10 MMBtu/h), each.

(c) The requirements of the New Source Performance Standard for Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, 40 CFR 60, Subpart K and 326 IAC 12, are not included in the permit for the storage vessels, since the storage vessels were constructed after May 19, 1978, have a capacity less than 151,412 liters (40,000 gallons), each, and do not store a petroleum liquid, as defined in §60.111a(b).

(d) The requirements of the New Source Performance Standard for Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60, Subpart Ka and 326 IAC 12, are not included in the permit for the storage vessels, since the storage vessels were constructed after July 23, 1984, have a capacity less than 151,412 liters (40,000 gallons), each and does not store a petroleum liquid, as defined in §60.111a(b)

(e) The requirements of the New Source Performance Standard for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for the storage vessels, since the storage vessels have a capacity less than 75 cubic meters ($m^3$), each.

(f) The requirements of the New Source Performance Standard for Standards of Performance for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE and 326 IAC 12, are not included in the permit for the surface coating and powder coating booths, since the surface coating and powder coating booths do not coat metal furniture.

(g) The requirements of the New Source Performance Standard for Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are not included in the permit for the surface coating and powder coating booths, since the surface coating and powder coating booths do not use prime coats, guide coats, or topcoats, and the source is not an automobile or light-duty truck assembly plant.

(h) The requirements of the New Source Performance Standard for Standards of Performance for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW and 326 IAC 12, are not

included in the permit for the surface coating and powder coating booths, since the surface coating and powder coating booths do not coat beverage cans.

(i) The requirements of the New Source Performance Standard for Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT and 326 IAC 12, are not included in the permit for the surface coating and powder coating booths, since the surface coating and powder coating booths does not coat plastic parts for use in the manufacture of business machines, as defined in §60.721

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

**National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, Subpart T are not included in the permit for the parts washers (PW-1, PW-2, Millwright Department, WS-72, PW-3, PW-4, PW-5, PW-6), since the parts washers (PW-1, PW-2, Millwright Department, WS-72, PW-3, PW-4, PW-5, PW-6) do not use any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, Subpart KK are not included in the permit for the ink stamper (119G028), since the ink stamper (119G028) is not a rotogravure, product and packaging rotogravure, or wide-web flexographic printing press, and the source is not a major source of HAP emissions.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Automobiles and Light-Duty Trucks, Subpart IIII are not included in the permit for the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the surface coating booths (SCP101, SCP102, SCP103, and SCP104) do not coat automobile and light-duty trucks, and the source is not a major source of HAP emissions.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paper and Other Web Coating, Subpart JJJJ are not included in the permit for the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the surface coating booths (SCP101, SCP102, SCP103, and SCP104) are not web coating lines and the source is not a major source of HAP emissions.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Cans, Subpart KKKK are not included in the permit for the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the surface coating booths (SCP101, SCP102, SCP103, and SCP104) do not coat metal cans and ends (including decorative tins) and metal crowns and closures, and the source is not a major source of HAP emissions.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, Subpart MMMM are not included in the permit for the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the source is not a major source of HAP emissions.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Large Appliances, Subpart NNNN are not included in the permit for the surface coating booths (SCP101, SCP102, SCP103, and SCP104) a, since the surface coating

booths (SCP101, SCP102, SCP103, and SCP104) do not coat large appliances and the source is not a major source of HAP emissions.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Printing, Coating, and Dyeing of Fabrics and Other Textiles, Subpart OOOO are not included in the permit for the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the surface coating booths (SCP101, SCP102, SCP103, and SCP104) do not coat fabric and other textiles, and the source is not a major source of HAP emissions.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, Subpart PPPP are not included in the permit for the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the surface coating booths (SCP101, SCP102, SCP103, and SCP104) do not coat plastic parts and the source is not a major source of HAP emissions.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Wood Building Products, Subpart QQQQ are not included in the permit for the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the surface coating booths (SCP101, SCP102, SCP103, and SCP104) do not coat wood building products and the source is not a major source of HAP emissions.

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Furniture, Subpart RRRR are not included in the permit for the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the surface coating booths (SCP101, SCP102, SCP103, and SCP104) do not coat metal furniture and the source is not a major source of HAP emissions.

(l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Coil, Subpart SSSS are not included in the permit for the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the surface coating booths (SCP101, SCP102, SCP103, and SCP104) do not coat metal coils and the source is not a major source of HAP emissions.

(m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, Subpart DDDDD are not included in the permit for the natural gas-fired units, since the natural gas-fired units are not considered boilers or process heaters, and the source is not a major source of HAP emissions.

(n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH are not included in the permit for the parts washers (PW-1, PW-2, Millwright Department, WS-72, PW-3, PW-4, PW-5, PW-6) and surface coating units (SCP101, SCP102, SCP103, and SCP104), since the parts washers (PW-1, PW-2, Millwright Department, WS-72, PW-3, PW-4, PW-5, PW-6) and surface coating units (SCP101, SCP102, SCP103, and SCP104) do not use solvents containing MeCl, and the surface coating units (SCP101, SCP102, SCP103, and SCP104) do not apply spray application of coatings.

(o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, Subpart JJJJJJ are not included in the permit for the natural gas-fired units, since the natural gas-fired units are not considered boilers.

(p) The requirements of National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, Subpart XXXXXX are not included in the permit for the grinding, shot peen, and sawing units, since the grinding, shot peen, and sawing units do not have the potential to emit metal fabrication or finishing metal HAPs.

(q) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

**State Rule Applicability - Entire Source**

326 IAC 2-4.1 Major Sources of HAPs
The operation of the source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 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.

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.

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.

326 IAC 9 (Carbon Monoxide Emission Rules)
Pursuant to 326 IAC 9-1-2(a), the requirements of 326 IAC 9 are not applicable to the source, since the source is not considered a petroleum refinery, ferrous metal smelter, refuse incinerator, or operates refuse burning equipment.

326 IAC 10 (Nitrogen Oxide Rules)
Pursuant to 326 IAC 10-1-1(a), the requirements of 326 IAC 10 are not applicable to the source, since the source is not located in Clark or Floyd County.

**State Rule Applicability – Individual Facilities**

**Surface Coating Booths (SCP101, SCP102, SCP103, and SCP104)**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(b), the requirements of 326 IAC 6-3-2 are not applicable to the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the surface coating booths (SCP101, SCP102, SCP103, and SCP104) are considered dip coating booths.

326 IAC 8-1-6 (New facilities; general reduction requirements)
Pursuant to 326 IAC 8-1-6(1), the requirements of 326 IAC 8-1-6 are not applicable to the surface coating booths (SCP101, SCP102, SCP103, and SCP104), since the surface coating booths (SCP101, SCP102,

SCP103, and SCP104) do not have the potential to emit twenty-two and seven-tenths (22.7) megagrams (twenty-five (25) tons) or more per year, each.

326 IAC 8-2-9 (Miscellaneous metal and plastic parts coating operations)
Pursuant to 326 IAC 8-2-1(a), the requirements of 326 IAC 8-2-9 are not applicable to the surface coating booth (SCP101), since the surface coating booth (SCP101) was constructed before November 1, 1980 and source is not located in Clark, Elkhart, Floyd, Lake, Marion, Porter, or St. Joseph counties.

Pursuant to 326 IAC 8-2-1(a), the requirements of 326 IAC 8-2-9 are not applicable to the surface coating booths (SCP102, SCP103 and SCP104), since the source has agreed to limit VOC input to the surface coating booths (SCP102, SCP103 and SCP104) to less than 15.0 pounds per day, each.

**Powder Coating Operation (280PC01)**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Since the Powder Coating Operation (280PC01) has potential emissions less than 0.551 pound per hour after consideration of the integral control device(s), pursuant to 326 IAC 6-3-1(b)(14), it is exempt from the requirements of 326 IAC 6-3-2.

However, since the Powder Coating Operation (280PC01) has potential emissions greater than 0.551 pound per hour prior to consideration of the integral control device(s), in order to assure the Powder Coating Operation (280PC01) is not subject to the requirements of 326 IAC 6-3-2, the integral control device shall be in operation and control emissions from the Powder Coating Operation (280PC01) at all times the Powder Coating Operation (280PC01) is in operation.

| Facility or Process Description | Emission Unit ID | PTE Prior to Integral Device (lb/hr) | PTE After Integral Device (lb/hr) |
|---|---|---|---|
| Power Coating Operation | 280PC01 | 2.85 | 0.009 |

**Grinding, Shot Peen, and Sawing Units**

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are not applicable to the grinding, shot peen, and sawing units (125F041, BS1, FD1, MS1, MS2, SG1, WG1, SG2, SG3, CS1, and 340F027), since they have potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour, each.

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the baghouses (123H004, 125X030, 125X031, 125X032, 533X005, 340X027, 122X01, 230X023, 230X024, MDC, 336X003, 336X002, 336X001, 550X07, 550X002, 550X007, 550X008, 550X009, and 550X010), since the grinding, shot peen, and sawing units controlled by the baghouses are a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and are not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

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

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

Pursuant to 326 IAC 6-3-2, the particulate matter from the baghouses shall be limited as follows:

| Control Device | Process Weight (tn/hr) | Emission Limit (lb/hr) |
|---|---|---|

| | | |
|---|---|---|
| **Plant #1** | | |
| 123H004 | 0.10 | 0.90 |
| 125X030 | 10.04 | 19.23 |
| 125X031 | 10.04 | 19.23 |
| 125X032 | 22.37 | 32.89 |
| 553X005 | 5.75 | 13.24 |
| 340X027 | 0.44 | 2.35 |
| **Plant #2** | | |
| 122X01 | 0.51 | 2.61 |
| 230X023 | 8.93 | 17.78 |
| 230X024 | 0.51 | 2.61 |
| MDC | 0.74 | 3.36 |
| **Plant #3** | | |
| 336X003 | 21.71 | 32.24 |
| 336X002 | 21.71 | 32.24 |
| 336X001 | 1.56 | 5.52 |
| **Plant #5** | | |
| 550X07 | 9.71 | 18.80 |
| 550X002 | 0.09 | 0.84 |
| 550X007 | 0.39 | 2.18 |
| 550X008 | 5.24 | 12.44 |
| 550X009 | 13.42 | 23.36 |
| 550X010 | 0.07 | 0.69 |

The baghouses listed shall be in operation at all times the grinding, shot peen, and sawing units are in operation, in order to comply with these limits.

**Natural Gas Combustion**

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

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

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation.

| Indirect Heating Units Which Began Operation After September 21, 1983 | | | | | | |
|---|---|---|---|---|---|---|
| Facility | Construction Date | Operating Capacity (MMBtu/hr) | Q (MMBtu/hr) | Calculated Pt (lb/MMBtu) | Particulate Limitation, (Pt) (lb/MMBtu) | PM PTE based on AP-42 (lb/MMBtu) |
| 550L001 | 1998 | 1.20 | 1.20 | 1.04 | 0.60 | 0.002 |
| 550L003 | 2001 | 1.20 | 2.40 | 0.87 | 0.60 | |
| 135L003 | 2002 | 0.53 | 32.42 | 0.44 | 0.44 | |
| 135L009 | | 1.00 | | | | |
| 135L008 | | 0.18 | | | | |
| 135L007 | | 0.50 | | | | |
| 352L010 | | 0.20 | | | | |
| 330L010 | | 1.00 | | | | |
| 330K012 | | 1.00 | | | | |
| 130J017 | | 2.00 | | | | |
| 533J016 | | 1.50 | | | | |
| 130J011 | | 4.10 | | | | |
| 130L026 | | 2.00 | | | | |
| 533L021 | | 1.00 | | | | |
| 533L020 | | 0.80 | | | | |
| 130J024 | | 3.00 | | | | |
| 533J025 | | 3.00 | | | | |
| 628H002 | | 1.75 | | | | |
| 628H004 | | 0.95 | | | | |
| 628L001 | | 1.50 | | | | |
| 628L002 | | 2.50 | | | | |
| 628J001 | | 0.95 | | | | |
| 628J001 (Thermal Oxidizer) | | 0.56 | | | | |
| 550L005 | 2003 | 1.20 | 33.62 | 0.44 | 0.44 | |
| 336L002 | 2018 | 2.00 | 38.62 | 0.42 | 0.42 | |
| 336H001 | | 0.50 | | | | |
| 336H002 | | 0.50 | | | | |
| OV-1 | | 2.00 | | | | |
| Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed. | | | | | | |

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

326 IAC 7 (Sulfur Dioxide Rules)

Pursuant to 326 IAC 7-1.1-1, the requirements of 326 IAC 7 are not applicable to the natural gas combustion units, since the natural gas combustion units do not have the potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide, each.

**Parts Washers and Solvent Cleaning**

326 IAC 8-3 Organic Solvent Degreasing Operations
Pursuant to 326 IAC 8-3-1(c), the requirements of 326 IAC 8-3-2 are applicable to the parts washers (PW-1, PW-2, Millwright Department, WS-72, PW-3, PW-4, PW-5, PW-6), since they are cold cleaner degreasers constructed after July 1, 1990. The Permittee shall:

(a) Ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.
(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:
(A) must be a solid, fluid stream; and
(B) shall be applied at a pressure that does not cause excessive splashing.

Pursuant to 326 IAC 8-3-1(c), the requirements of 326 IAC 8-3-8 are applicable to the parts washers (PW-1, PW-2, Millwright Department, WS-72, PW-3, PW-4, PW-5, PW-6), since they are cold cleaner degreasers constructed after January 1, 2015. The Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury

(nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Pursuant to 326 IAC 8-3-1(a), the requirements of 326 IAC 8-3 are not applicable to the clean-up solvent operations used in SCP101, SCP102, SCP103, and SCP104, since the clean-up solvent operations used in SCP101, SCP102, SCP103, and SCP104 do not use degreasers.

326 IAC 8-6 (Organic Solvent Emissions Limitations)
Pursuant to 326 IAC 8-6-1, the requirements of 326 IAC 8-6 are not applicable to the parts washers (PW-1, PW-2, Millwright Department, WS-72, PW-3, PW-4, PW-5, PW-6) and clean-up solvent operations used in SCP101, SCP102, SCP103, and SCP104, since they were constructed after January 1, 1980.

326 IAC 8-17 (Industrial Solvent Cleaning Operations)
Pursuant to 326 IAC 8-17-1(a), the requirements of 326 IAC 8-17 are not applicable to the parts washers (PW-1, PW-2, Millwright Department, WS-72, PW-3, PW-4, PW-5, PW-6) and clean-up solvent operations used in SCP101, SCP102, SCP103, and SCP104, since the source is not located in Lake or Porter County.

**Flame Cutting**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are not applicable to the flame cutting units, since they have potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour, each.

**Ink Stamping**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are not applicable to the ink stamper (119G028), since it has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-2 (Surface Coating Emission Limitations)
Pursuant to 326 IAC 8-2-9(a), the requirements of 326 IAC 8-2-9 are not applicable to the ink stamper (119G028), since the ink stamper (119G028) is not considered a surface coating operation.

326 IAC 8-3 Organic Solvent Degreasing Operations
Pursuant to 326 IAC 8-3-1(c), the requirements of 326 IAC 8-3-2 are not applicable to the ink stamper (119G028), since the ink stamper (119G028) is not considered a degreaser.

326 IAC 8-5-5 (Graphic Arts Operations)
Pursuant to 326 IAC 8-5-5(a), the requirements of 326 IAC 8-5-5 are not applicable to the ink stamper (119G028), since the ink stamper (119G028) is not a packaging rotogravure, publication rotogravure, and flexographic printing source.

326 IAC 8-6 (Organic Solvent Emissions Limitations)
Pursuant to 326 IAC 8-6-1, the requirements of 326 IAC 8-6 are not applicable to the ink stamper (119G028), since it was constructed after January 1, 1980.

326 IAC 8-16 (Offset Lithographic Printing and Letter Press Printing)
Pursuant to 326 IAC 8-16-1(a), the requirements of 326 IAC 8-16 are not applicable to the ink stamper (119G028), since the ink stamper (119G028) is not an offset lithographic printing operation or letterpress printing operation, and the source is not located in Lake or Porter County.

326 IAC 8-17 (Industrial Solvent Cleaning Operations)

Pursuant to 326 IAC 8-17-1(a), the requirements of 326 IAC 8-17 are not applicable to the ink stamper (119G028), since the source is not located in Lake or Porter County.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-8 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

(a) The Compliance Determination Requirements applicable to this source are as follows:

| Summary of Testing Requirements | | | | | |
|---|---|---|---|---|---|
| **Emission Unit** | **Control Device** | **Timeframe for Testing** | **Pollutant** | **Frequency of Testing** | **Authority** |
| **Plant #1** | | | | | |
| 125F076 | 125X032 | 180** | PM/PM10/PM2.5 | Every 5 years | 326 IAC 2-8-4(1)<br>326 IAC 2-2<br>326 IAC 6-3-2 |
| 125F070 | | | | | |
| 125F031 | | | | | |
| 127F035 | | | | | |
| 125F022 | | | | | |
| 127H001 | | | | | |
| 125F039 | | | | | |
| 125F027 | | | | | |
| 125F021 | | | | | |
| 125F034 | | | | | |
| 125F023 | | | | | |
| 125F019 | | | | | |
| 125F020 | | | | | |
| 125F044 | | | | | |
| 125F069 | | | | | |
| 127U004 | | | | | |
| 127F014 | | | | | |
| 127F018 | | | | | |
| **Plant #3** | | | | | |
| 336H001 | 336X003 | 180* | PM/PM10/PM2.5 | Every 5 years | 326 IAC 2-8-4(1)<br>326 IAC 2-2<br>326 IAC 6-3-2 |
| 336H003 | | | | | |
| 336H005 | | | | | |
| 336F007 | | | | | |
| 336F008 | | | | | |
| 336F010 | | | | | |
| 336F002 | 336X002 | 180* | PM/PM10/PM2.5 | | |
| 336F003 | | | | | |

| | | | | | |
|---|---|---|---|---|---|
| 336F004<br>336F005<br>125F053 | | | | | |
| 336H004<br>336F006<br>336F007<br>336F009 | 336X001 | 180* | PM/PM10/PM2.5 | | |
| **Plant #5** | | | | | |
| 550H002 | 550X07 | 180** | PM/PM10/PM2.5 | Every 5 years | 326 IAC 2-8-4(1)<br>326 IAC 2-2<br>326 IAC 6-3-2 |
| 550H007 | 550X009 | 180** | PM/PM10/PM2.5 | Every 5 years | 326 IAC 2-8-4(1)<br>326 IAC 2-2<br>326 IAC 6-3-2 |

* 180 days is 180 days after startup.
** 180 days after the issuance of permit No 017-39266-00022.

(b) The Compliance Monitoring Requirements applicable to this source are as follows:

| Control | Parameter | Frequency | Range | Excursions and Exceedances |
|---|---|---|---|---|
| **Plant #1** | | | | |
| Baghouse (123H004) | Visible Emissions | Daily | Normal - Abnormal | Response Steps |
| Baghouse (125X030) | | | | |
| Baghouse (125X031) | | | | |
| Baghouse (125X032) | | | | |
| Baghouse (533X005) | | | | |
| Baghouse (340X027) | | | | |
| **Plant #2** | | | | |
| Baghouse (122X01) | Water Pressure Drop | Daily | 0.5 to 3.0 inches | Response Steps |
| Dust Collector (MDC) | | | 0.5 to 3.0 inches | |
| Baghouse (230X023) | Visible Emissions | | Normal - Abnormal | |
| Baghouse (230X024) | | | | |
| **Plant #3** | | | | |
| Baghouse (336X003) | Visible Emissions | Daily | Normal - Abnormal | Response Steps |
| Baghouse (336X002) | | | | |
| Baghouse (336X001) | | | | |
| **Plant #5** | | | | |
| Baghouse (550X07) | Water Pressure Drop | Daily | 0.5 to 3.0 inches | Response Steps |
| Baghouse (550X002) | | | 0.5 to 3.0 inches | |
| Baghouse (550X007) | | | 0.5 to 3.0 inches | |
| Baghouse (550X008) | | | 0.5 to 3.0 inches | |
| Baghouse (550X009) | Visible Emissions | | Normal - Abnormal | |
| Baghouse (550X010) | | | Normal - Abnormal | |

These monitoring conditions are necessary because the baghouses for the grinders and shot peens must operate properly to assure compliance with 326 IAC 2-8-4(1) (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 6-3-2 (Particulate Matter Limitations for Manufacturing Processes).

**Proposed Changes**

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

(1) For the FESOP Renewal with New Source Review, IDEM, OAQ has added new units to the permit.

(2) For the FESOP Renewal with New Source Review, IDEM, OAQ has removed units from the permit.

(3) For the FESOP Renewal with New Source Review, IDEM, OAQ has added new Compliance Monitoring and Determination Requirements to the permit.

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

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

~~(a)~~ Plant #1

(~~1~~**a**) ~~One (1) segment~~ **One (1) dip, brush, and roll coating booth applying paints and inks to steel springs and miscellaneous metal parts**, identified as SCP101, ~~installed in 1952, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through three (3) stacks (ID #'s S101A, S101C and S101D).~~ **constructed in 1952, with a maximum capacity of 0.016 gallons per unit and 66.0 units per hour, using no controls, exhausting outdoors.**

**(1) One (1) clean-up solvent used in paint booth SCP 101, with a maximum capacity of 1825.0 gallons per year, using no controls, and exhausting outdoors.**

(~~2~~**b**) ~~One (1) segment, identified as SCP102, installed in 1952, for marking steel springs with a rollcoater or stamper, and exhausting through two (2) stacks (ID #'s S102A and S102B).~~

**Three (3) dip coating units applying paint to steel springs, identified as SCP102, SCP103, and SCP104, approved in 2018 for construction, applied using a paint tumbler, with a maximum capacity of 0.0003 gallons per unit and 1000.0 units per hour, each, using no controls, and venting outdoors.**

(~~3~~) ~~One (1) segment, identified as SCP103, installed in 1952, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through two (2) stacks (ID #'s S103A and S103B).~~

~~(4) One (1) operation identified as grinding tooling department consisting of one (1) small hand grinder controlled by one (1) baghouse identified as 125x030 (GP101).~~

(~~5~~) ~~One (1) operation identified as Department 122 consisting of:~~

~~(A) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101), installed in 1951.~~

~~(B) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103), installed in 1951.~~

~~(6) One (1) operation identified as Department 125 consisting of:~~

~~(A) Sixteen (16) grinders, with two (2) of the grinders controlled by a dust collector identified as 125x030 (GP101), installed in 1951; with four (4) of the grinders controlled by a dust collector identified as 125x031 (GP102), installed in 1951; and ten of the grinders controlled by a dust collector identified as 125x032 (GP104), installed in 1951.~~

~~(B) Two hand grinders~~

~~(7) One (1) operation identified as Department 119 (segment 1) consisting of a shot peen unit identified as 123H004 (GP105), installed in 1980, controlled by the dust collector and exhausting inside the building.~~

~~(8) One (1) operation identified as shot peening department consisting of four (4) shot peens, each using steel shot and controlled by one (1) baghouse identified as 533x005 (GP103), installed in 1951.~~

~~(9) One (1) operation identified as Department 123 (medium coiling) consisting of one (1) grinder controlled by a dust collector 125x032 (GP104), installed in 1951.~~

~~(10) One (1) operation identified as Department 127 consisting of the following:~~

~~(A) One (1) shot peen unit identified as 127H001 controlled by a dust collector 533x005 (GP103), installed in 1951.~~

~~(B) Three (3) grinders and one (1) chamfer, each controlled by a dust collector 125x032 (GP104), installed in 1951.~~

**(c) One (1) grinding operation, identified as Department 25, and consisting of:**

**(1) Fifteen (15) grinders, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors. The grinders are identified as the following:**

**(A) 125F076**
**(B) 125F070**
**(C) 125F031**
**(D) 127F035**
**(E) 125F022**
**(F) 127H001**
**(G) 125F039**
**(H) 125F027**
**(I) 125F021**
**(J) 125F034**
**(K) 125F023**
**(L) 125F019**
**(M) 125F020**
**(N) 125F044**
**(O) 125F069**

**(2) One (1) grinder, identified as 125F057, constructed prior to 2003, using a dust collector (125X031) as control, and exhausting outdoors.**

**(3) Five (5) grinders, with four (4) constructed prior to 2003 and 336F001 approved in 2018 for construction, using a dust collector (125X030) as control, and exhausting outdoors. The grinders are identified as the following:**

**(a) 125F055**
**(b) 125F059**
**(c) 125F054**
**(d) 125F056**
**(e) 336F001**

**(d) One (1) mixed manufacturing operation, located in Department 27, and consisting of the following:**

**(1) One (1) cut-off saw, identified as 127U004, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting indoors.**

**(e) Five (5) shot peen units, located in Department 35, constructed prior to 2003, using a dust collector (533X005) as control, and exhausting outdoors. The shot peen units are identified as the following:**

**(1) 137H011**
**(2) 137H012**
**(3) 137H013**
**(4) 137H001**
**(5) 137H010**

**(f) Two (2) grinders, identified as 127F014 and 127F018, constructed prior to 2003, using a dust collector (125X032) as control, and exhausting outdoors.**

~~(b)~~ Plant #2

**(g) Two (2) grinders, identified as 533F032 and 533F037, approved in 2018 for construction, using a dust collector (230X023) as control, and exhausting outdoors.**

(~~1~~) ~~One (1) segment identified as SCP201, installed in 1960, for applying water based paints by dipping steel springs in a dip tank and then putting onto a conveyorized rack for drying.~~

(~~2~~) ~~One (1) operation identified as hot coil department consisting of the following:~~

**(h) Two (2) shot peen units, identified as 230H16 and 230H17, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting outdoors.**

(~~A~~**i**) ~~One (1) shot peen unit~~ **Two (2) shot peen units,** identified as 533H011 **and 230H001**, **constructed prior to 2003, using** ~~controlled by~~ a dust collector ~~230x024 (GP202)~~ **(230X023) as control, and exhausting outdoors.** ~~installed in 1960~~.

**(j) One (1) cut-off saw, identified as 130U010, constructed prior to 2003, using a dust collector (230X023) as control, and exhausting outdoors.**

~~(B) One (1) shot peen unit identified as 30H12 controlled by a dust collector 230x024 (GP202), installed in 1960, and two (2) spring presses.~~

(~~C~~) ~~Two (2) hand grinders, controlled by a dust collector identified as 233x023 (GP201), installed in 1960 and exhausting indoors.~~

~~(D) Two (2) abrasive saws controlled by drum dust collector.~~

~~(c)~~ Plant #3

~~There are no activities qualified as significant at the plant.~~

**(k) Three (3) shot peen units, identified as 336H001, 336H003, and 336H005 approved in 2018 for construction, using a dust collector (336X003) as control and a dust collector (336X002) as backup control, and exhausting outdoors.**

**(l) Three (3) tandem grinders, identified as 336F007, 336F008, and 336F010, approved in 2018 for construction, using a dust collector (336X003) as control and a dust collector (336X002) as backup control, and exhausting outdoors.**

**(m) Four (4) OD chamfer grinders, identified as 336F002, 336F003, 336F004, and 336F005, approved in 2018 for construction, using a dust collector (336X002) as control and a dust collector (336X003) as backup control, and exhausting outdoors.**

**(n) One (1) Fuel Cell operation consisting of the following:**

**(1) One (1) shot peen unit, identified as 336H004, approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.**

**(2) Two (2) grinders, identified as 336F006 and 336F007 approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.**

**(3) One (1) OD chamfer grinder, identified as 336F009, approved in 2018 for construction, using a dust collector (336X001) as control, and exhausting outdoors.**

**(o) One (1) wheel grinder, identified as 125F053, approved in 2018 for construction, using a dust collector (336X002) as control, and exhausting outdoors.**

~~(e)~~ Plant #5

~~There are no activities qualified as significant at the plant.~~

**(p) One (1) mixed manufacturing operation, located in Department 50, and consisting of the following:**

**(1) One (1) shot peen unit, identified as 550H005, constructed prior to 2003, using a dust collector (550X007) as control, and exhausting indoors.**

**(2) One (1) shot peen unit, identified as 550H007, constructed prior to 2003, using two (2) dust collectors (550X008 and 550X009) as control, and exhausting indoors and outdoors, respectively.**

~~(d)~~ Plant #6

(~~1~~**q**) One (1) powder coating application system **used for electrostatic spray application of dry epoxy powder to coiled steel springs,** identified as ~~280PC01~~**628S00P,** ~~for electrostatic spray application of dry epoxy powder to coiled steel springs~~, **constructed prior to 2003, with a maximum capacity of 0.00008 pounds per unit and 2,220 units per hour**, ~~using dry filters for overspray~~ **using an integral dry cartridge filter as** control, **and exhausting outdoors**.

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

This stationary source also includes the following insignificant activities:

~~(a) One (1) segment in Plant #3, identified as SCP301, where steel T-bar ends are dipped into a small dip tank for identification coating and then put onto a rack to air dry.~~

(~~b~~**a**) Natural gas-fired combustion sources with heat input equal or less than ten ~~(10) mmBtu/hr~~ **million (10,000,000) British thermal units per hour**.

**Plant #1**

(1) Two (2) natural gas-fired ovens ~~(135L003 and 135L009) located under the stress relieve and heatset department at Plant #1, each rated at~~ **identified as 135L003 and 135L009, constructed in 2003, with a maximum heat input capacity of** 0.53 and 1.0 MMBtu/hr, respectively, **using no controls, and exhausting indoors**.

(2) One (1) natural gas-fired oven, **identified as** 135L008, ~~located under Department 135 at Plant #1, rated at~~ **constructed in 2003, with a maximum heat input capacity of** 0.18 MMBtu/hr, **using no controls, and exhausting indoors.**

(3) ~~Three (3)~~ **One (1)** natural gas-fired oven~~s,~~ identified as 135L007, ~~135L005 and 135L001 located under Department 123 at Plant #1, each rated at~~ **constructed in 2003, with a maximum heat input capacity of** 0.5~~, 0.8 and 0.53~~ MMBtu/hr, **using no controls, and exhausting indoors**.

**(4) One (1) natural gas-fired annealing furnace, identified as 352L010, constructed prior to 2003, with a maximum heat input capacity of 0.20 MMBtu/hr, using no controls, and exhausting outdoors.**

**(5) One (1) natural gas-fired oven, identified as OV-1, approved in 2018 for construction, with a maximum heat input capacity of 2.0 MMBtu/hr, using no controls, and exhausting outdoors.**

**Plant #2**

(~~5~~**6**) ~~Three (3)~~ **Two (2)** natural gas-fired furnaces, ~~located under the heat treat department at Plant #2, each rated at~~ identified as 330L010 and 330K012, **constructed in 2003, with a maximum heat input capacity of 1.0 MMBtu/hr, each, using no controls, and exhausting indoors.**

(~~6~~**7**) Three (3) natural gas-fired bar furnaces ~~(J17, J16, J11) located under the hot coil department at Plant #2, each rated at~~ **identified as 130J017, 533J016, and 130J011, constructed in 2003, with a maximum heat input capacity of** 2.0,

1.5 and 4.10 MMBtu/hr, **respectively, using no controls, and exhausting indoors.**

(~~7~~**8**) Three (3) natural gas fired draw ~~furnaces located under the hot coil department, each rated at~~, **identified as 130L026, 533L021, and 533L020, constructed in 2003, with a maximum heat input capacity of** 2.0, 1.0, and 0.8 MMBtu/hr, **respectively, using no controls, and exhausting indoors**.

(4**9**) ~~Two (2) natural gas fired furnaces (K30 and L20) located under the heat treat department at Plant #2, each rated at 4.2 and 1.2 MMBtu/hr.~~

**Two (2) natural gas-fired furnaces, identified as 130J024 and 533J025, approved for constructed in 2018, with a maximum heat input capacity of 3.0 MMBtu/hr, each, using no controls, and exhausting indoors.**

**Plant #3**

~~(8) One (1) natural gas fired stress relief oven rated at 0.8 MMBtu/hr and One (1) natural gas fired annealing furnace, rated at 0.20 MMBtu/hr, both located at Plant #3~~

~~(9) Two (2) natural gas fired furnaces, each rated at 1.2 MMBtu/hr and located at Plant #5.~~

**(10) One (1) natural gas-fired heat stress oven, identified as 336L002, approved in 2018 for construction, with a maximum heat input capacity of 2.0 MMBtu/hr, using no controls, and exhausting outdoors.**

**(11) Two (2) make-up air units, identified as 336H001 and 336H002, approved for construction in 2018, with a maximum heat input capacity of 0.50 MMBtu/hr, each, using no controls, and exhausting outdoors.**

**Plant #5**

**(12) Three (3) natural gas-fired furnaces, identified as 550L001, 550L003, 550L005 constructed in 1998, 2001, and 2003, respectively, with a maximum heat input capacity of 1.2 MMBtu/hr, each, using no controls, and exhausting outdoors.**

**Plant #6**

~~(10) Two (2) natural gas-fired radiant solution heaters (280AA01-1 and 280AA01-2) with maximum heat input capacities of 1.75 mmBtu/hr and 0.95 mmBtu/hr, located at Plant #6.~~

**(13) Two (2) natural gas-fired radiant solution water heaters, identified as 628H002 and 628H004, constructed prior to 2003, with a maximum heat input capacity of 1.75 and 0.95 MMBtu/hr, respectively, using no controls, and exhausting indoors.**

~~(11) Two (2) natural gas-fired furnaces for drying parts and powder curing (280J001 and 280J002) with maximum heat input capacities of 1.5 mmBtu/hr and 2.5 mmBtu/hr, located at Plant #6.~~

~~(12) One (1) natural gas-fired controlled pyrolysis cleaning furnace for cleaning fixtures, identified as 280J003, with a maximum heat input capacity of 0.950~~

~~mmBtu/hr, located at Plant #6. The furnace is equipped with an integral thermal oxidizer, using a maximum of 0.56 mmBtu/hr of natural gas.~~

**(14) Two (2) natural gas-fired furnaces for drying parts and powder curing, identified as 628L001 and 628L002, constructed prior to 2003, with a maximum heat input capacity of 1.5 and 2.5 MMBtu/hr, respectively, using no controls, and exhausting outdoors.**

**(15) One (1) natural gas-fired pyrolysis cleaning furnace, identified as 628J001, constructed prior to 2003, with a maximum heat input capacity of 0.95 MMBtu/hr, using a natural gas-fired thermal oxidizer, with a maximum heat input capacity of 0.56 mmBtu/hr as control, and exhausting indoors.**

(b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(d) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.

(e) Application of oils, lubricants or other nonvolatile materials applied as temporary protective coatings.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. ~~[326 IAC 6-3-2]~~

**Plant #1**

**(1) Four (4) flame cutting stations, constructed prior to 2003, with a maximum metal thickness of 0.6 inches and maximum cutting rate of 5.0 inches per minute, using no controls, and exhausting indoors.**

**Plant #3**

**(2) Four (4) flame cutting stations, constructed prior to 2003, with a maximum metal thickness of 0.6 inches and maximum cutting rate of 5.0 inches per minute, using no controls, and exhausting indoors.**

(h) Groundwater oil recovery wells.

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(j) Quenching operations used with heat treating processes.

(k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(l) Process vessel degassing and cleaning to prepare for internal repairs.

(m) Paved ~~and unpaved~~ roads ~~and parking lots with public access.~~

(n) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(o) Blowdown for any of the following: sight glass, boiler, compressors, pump and cooling tower.

(p) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. ~~[326 IAC 6-3-2]~~

**Plant #1**

**(1) One (1) shot peen unit, identified as 123H004, constructed in 1980, using a dust collector (123H004) as control, and exhausting outdoors.**

(4**2**) One (1) wet grinder, identified as 125F041, **constructed prior to 2003, using** ~~controlled by~~ a dust collector ~~with the flow rate of 100 acfm~~**(125X041) as control,** and exhausting indoors ~~(Plant #1 first floor)~~. ~~[326 IAC 6-3-2]~~

**(3) One (1) belt sander, one (1) feeder, two (2) multislides, and one (1) small grinder, identified as BS1, FD1, MS1, MS2, and SG1, respectively, constructed prior to 2003, with a combined maximum throughput of 0.01 pounds per hour, using no controls, and exhausting outdoors.**

**(4) One (1) bead blast unit, identified as 340H002, constructed prior to 2003, using a dust collector (340X027) as control, and exhausting outdoors.**

**(5) One (1) wet surface grinder, two (2) surface grinders, one (1) cutoff saw, identified as WG1, SG2, SG3, and CS1, respectively, constructed prior to 2003, with a combined maximum throughput of 0.01 pounds per hour, using no controls, and exhausting indoors.**

**Plant #2**

**(6) One (1) shot peen unit, identified as 130H012, approved in 2018 for construction, using a dust collector (230X024) as control, and exhausting outdoors.**

**(7) Two (2) cut-off saws, identified as 533U001 and 533U010, constructed prior to 2003, using a mobile dust collector (MDC) as control, and exhausting indoors.**

(~~5~~**8**) Two (2) grinders, identified as 122F11 and 122F04, ~~each controlled by a dust collector with the flow rate of 100 acfm, identified as 122x01 (Department 22)~~ . ~~[326 IAC 6-3-2]~~ **constructed prior to 2003, using a dust collector (122X01) as control, and exhausting indoors.**

**Plant #3**

~~(1) One (1) belt sander, one (1) feeder, two (2) multislides, one (1) small grinder, controlled by a dust collector. with air flow rate of 900 acfm and venting inside the building (Plant #3). [326 IAC 6-3-2~~

~~(2) Tool and dye shop consisting of drill presses, cutting saws, lathes, mill, one (1) blanchard wet grinder (340F027), one (1) wet surface grinder, two surface grinders, one (a) cutoff saw, one (1) dust collector controlling particulate emissions from the five (5) grinders and one (1) bead blast unit (340H002) with an air flow rate of 900 acfm (Plant #3). [326 IAC 6-3-2]~~

**(9) One (1) Blanchard wet grinder, identified as 340F027, constructed prior to 2003, using a dust collector (340X027) as control, and exhausting outdoors.**

**Plant #5**

(3**10**) ~~Two (2) shot peen units identified as 550H01 and 550H02, each controlled by one (1) dust collector identified as 550x01 and 550x02, and with the air flow rate of 765 and 935 acfm, respectively (Plant #5). [326 IAC 6-3-2]~~

**One (1) grinder, identified as 550F001, approved in 2018 for construction, using a dust collector (550X010) as control, and exhausting outdoors.**

**(11) One (1) shot peen unit, identified as 550H001, constructed prior to 2003, using a dust collector (550X002) as control, and exhausting indoors.**

**(12) One (1) shot peen unit, identified as 550H002, constructed prior to 2003, using a dust collector (550X07) as control, and exhausting indoors.**

~~(6) One (1) shot peen unit identified as 230H001 and controlled by a dust collector (230x002) with air flow rate of 900 acfm (Plant #2 hot coil department). [326 IAC 6-3-2]~~

(q) ~~Miscellaneous use of VOC containing materials for cleaning, part washing, quality assurance tests, and rust inhibiting the finished product consuming less than 3 pounds per hour or 15 pounds per day of VOC.~~ **Emission units or activities whose potential uncontrolled VOC emissions meet the exemption levels of three (3) pounds per hour or fifteen (15) pounds per day.**

**Plant #1**

(1) Application of water soluble anti-rust solution identified as WS-72 at Plant #1 department 119.

(~~1~~**2**) One (1) **stamp pad** ink application operation ~~through stamp pad~~ **identified as 119G028, constructed prior to 2003, with a maximum capacity of 0.11 pounds per hour, using no controls, and exhausting indoors.**

(~~2~~**3**) One (1) **parts washer**,~~operation,~~ identified as Millwright Department,~~ consisting of one (1) degreaser [326 IAC 8-3-2]~~ **with a maximum capacity of 30.0 gallons per year, using no controls, and exhausting indoors**.

(~~3~~**4**) One (1) parts ~~degreasing operation for department 127 [326 IAC 8-3-2]~~ **washer, identified as PW-1, constructed prior to 2003, with a maximum capacity of 30.0 gallons per year, using no controls, and exhausting indoors**.

(~~4~~**5**) One (1) parts ~~degreasing operation for department 135 [326 IAC 8-3-2]~~ **washer, identified as PW-2, located in Department 135, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.**

**(6) Three (3) clean-up solvent used in paint booths SCP102, SCP103, and SCP104, with a maximum capacity of 365.0 gallons per year, each, using no controls, and venting outdoors.**

(~~5~~**7**) One (1) paint operation using dip coating application method.

(~~6~~**8**) Two (2) oiling stations.

Plant #2

(~~7~~**9**) One (1) ~~maintenance department parts degreasing operation~~ **parts washer, identified as PW-3, located in Plant #2 Maintenance, constructed prior to 2003, with a maximum throughput of 30.0 gallons per year, using no controls, and exhausting indoors.**

Plant #3

(~~8~~**9**) One (1) parts ~~degreasing operation [326 IAC 8-3-2]~~ **washer, identified as PW-4, located in Plant #3 Maintenance, constructed prior to 2003, with a maximum throughput of 182.50 gallons per year, using no controls, and exhausting indoors.**

**Plant #5**

~~(9) One (1) GM torque rod line consisting of the following:~~

~~(A) One (1) nylon spraying operation controlled by cartridge filter capturing particulates. [326 IAC 6-3-2]~~

~~(B) One (1) paint application operation (F78WX) using dipping application method.~~

**(10) One (1) parts washer, identified as PW-5, located in Plant #5 Maintenance, constructed prior to 2003, with a maximum throughput of 182.50 gallons per year, using no controls, and exhausting indoors.**

**(11) One (1) parts washer, identified as PW-6, located in Rolling Area, approved for construction in 2018, with a maximum capacity of 30.0 gallons per year, using no controls, and exhausting indoors.**

(r) The maintenance activities for electric equipment which consumes greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAP.

~~(t) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):~~

~~Plant #1 (First Floor)~~

~~Plant #1 (Basement)~~

*Note: These changes were also made to sections D.1, D.2, and D.3 of the permit.*

**Compliance Determination Requirements [326 IAC 2-8-4(1)]**

**D.1.6 Testing Requirements [326 IAC 2-1.1-11]**

**(a) Not later than 180 days after the startup of the Plant #3 grinding, shot peen, and sawing units, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouses (336X003, 336X002, and 336X001) controlling the grinding and shot peen units utilizing methods approved by the commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.**

**(b) Not later than 180 days after the issuance date of this permit, Permit No 017-39266-00022, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouses 125X032, 550X07, 550X009 utilizing methods approved by the commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.**

## Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the applications and additional information submitted by the applicant. Applications for the purposes of this revision and renewal were received on November 8, 2017 and June 21, 2018.

The construction of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 017-40142-00022. The staff recommend to the Commissioner that this FESOP Significant Permit Revision be approved.

The operation of this stationary steel spring manufacturing source shall be subject to the conditions of the attached FESOP Renewal No. 017-39266-00022.

The staff recommends to the Commissioner that the FESOP Renewal be approved.

## IDEM Contact

(a) Questions regarding this proposed permit can be directed to Ethan Horvath 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) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.

(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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

**Appendix A: Emission Calculations**
**Summary**

**Company Name:** Matthew Warren Inc.
**Address:** 500 E. Ottawa Street, Logansport, IN 46947
**Renewal w/ NSR Permit No.:** 017-39266-00022
**Reviewer:** Ethan Horvath

**Uncontrolled Potential to Emit (tons/yr)**

| Emission Unit | PM | $PM_{10}$ | $PM_{2.5}$ * | $SO_2$ | $NO_x$ | VOC | CO | Total HAPs | Worst-Case HAP |
|---|---|---|---|---|---|---|---|---|---|
| Surface Coating | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 28.54 | 0.00 | 0.00 | 0.00 |
| Degreasing | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 12.96 | 0.00 | 0.00 | 0.00 |
| Grinding, Shot Peen, and Sawing | 1046.82 | 1046.82 | 1046.82 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Natural Gas Combustion | 0.32 | 1.26 | 1.26 | 0.10 | 16.58 | 0.91 | 13.93 | 0.31 | 0.30 Hexane |
| Powder Coating | 2.92E-04 | 2.92E-04 | 2.92E-04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Flame Cutting | 1.02 | 1.02 | 1.02 | 0.00 | 0.00 | 0.00 | 0.00 | 5.68E-03 | 3.15E-03 Manganese |
| Ink Stamping | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.36 | 0.00 | 0.00 | 0.00 |
| Insignificant Activities | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 3.00 | 1.00 | 1.00 | 1.00 PAH |
| Storage Vessels | 1.00 | 1.00 | 1.00 | 0.00 | 0.00 | 1.00 | 0.00 | 1.00 | 1.00 PAH |
| **Total** | **1050.16** | **1051.11** | **1051.11** | **1.10** | **17.58** | **46.78** | **14.93** | **2.32** | **2.00 PAH** |
| Paved Roads | 0.78 | 0.16 | 0.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* PM2.5 listed is direct PM2.5

**Potential to Emit after Issuance (tons/yr)**

| Emission Unit | PM | $PM_{10}$ | $PM_{2.5}$ * | $SO_2$ | $NO_x$ | VOC | CO | Total HAPs | Worst-Case HAP |
|---|---|---|---|---|---|---|---|---|---|
| Surface Coating | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 28.54 | 0.00 | 0.00 | 0.00 |
| Degreasing | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 12.96 | 0.00 | 0.00 | 0.00 |
| Grinding, Shot Peen, and Sawing | 87.59 | 87.59 | 87.59 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Natural Gas Combustion | 0.32 | 1.26 | 1.26 | 0.10 | 16.58 | 0.91 | 13.93 | 0.31 | 0.30 Hexane |
| Powder Coating | 2.92E-04 | 2.92E-04 | 2.92E-04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Flame Cutting | 1.02 | 1.02 | 1.02 | 0.00 | 0.00 | 0.00 | 0.00 | 5.68E-03 | 3.15E-03 Manganese |
| Ink Stamping | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.36 | 0.00 | 0.00 | 0.00 |
| Insgnificant Activities | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 3.00 | 1.00 | 1.00 | 1.00 PAH |
| Storage Vessels | 1.00 | 1.00 | 1.00 | 0.00 | 0.00 | 1.00 | 0.00 | 1.00 | 1.00 PAH |
| **Total** | **90.93** | **91.88** | **91.88** | **1.10** | **17.58** | **46.78** | **14.93** | **2.32** | **2.00 PAH** |
| Paved Roads | 0.78 | 0.16 | 0.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* PM2.5 listed is direct PM2.5

*The shaded cells indicate where limits are placed*

Note:

Calculations have not been completed for the storage vessels at the source, therefore their emissions have been estimated.

Calculations have not been completed for most insignificant activites at the source, therefore their emissions have been estimated based upon maximum allowable emissions.

**Appendix A: Emission Calculations**
**Modification Summary**

**Company Name:** Matthew Warren Inc.
**Address:** 500 E. Ottawa Street, Logansport, IN 46947
**Renewal w/ NSR Permit No.:** 017-39266-00022
**Reviewer:** Ethan Horvath

| Uncontrolled Potential to Emit (tons/yr) | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Emission Unit** | PM | $PM_{10}$ | $PM_{2.5}$ * | $SO_2$ | $NO_x$ | VOC | CO | Total HAPs | Worst-Case HAP |
| Surface Coating | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 15.49 | 0.00 | 0.00 | 0.00 |
| Degreasing | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 3.78 | 0.00 | 0.00 | 0.00 |
| Grinding, Shot Peen, and Sawing | 324.75 | 324.75 | 324.75 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Natural Gas Combustion | 0.04 | 0.16 | 0.16 | 0.01 | 2.15 | 0.12 | 1.80 | 0.04 | 0.04 Hexane |
| **Total** | **324.79** | **324.91** | **324.91** | **0.01** | **2.15** | **19.39** | **1.80** | **0.04** | **0.04 Hexane** |

* PM2.5 listed is direct PM2.5

| Potential to Emit after Issuance (tons/yr) | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Emission Unit | PM | $PM_{10}$ | $PM_{2.5}$ * | $SO_2$ | $NO_x$ | VOC | CO | Total HAPs | Worst-Case HAP |
| Surface Coating | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 15.49 | 0.00 | 0.00 | 0.00 |
| Degreasing | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 3.78 | 0.00 | 0.00 | 0.00 |
| Grinding, Shot Peen, and Sawing | 32.47 | 32.47 | 32.47 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Natural Gas Combustion | 0.04 | 0.16 | 0.16 | 0.01 | 2.15 | 0.12 | 1.80 | 0.04 | 0.04 Hexane |
| **Total** | **32.52** | **32.64** | **32.64** | **0.01** | **2.15** | **19.39** | **1.80** | **0.04** | **0.04 Hexane** |

* PM2.5 listed is direct PM2.5

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From Surface Coating Operations**

**Company Name:** Matthew Warren Inc.
**Address:** 500 E. Ottawa Street, Logansport, IN 46947
**Renewal w/ NSR Permit No.:** 017-39266-00022
**Reviewer:** Ethan Horvath

| Material | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **SCP101** | | | | | | | | | | | | | | | | |
| Kem Aqua 400 | 8.60 | 97.82% | 84.46% | 13.36% | 0.00% | 0.00% | 0.016 | 66.00 | 1.15 | 1.15 | 1.21 | 29.10 | 5.31 | 0.00 | #DIV/0! | 100% |
| **SCP102** | | | | | | | | | | | | | | | | |
| DYKEM Blue | 7.18 | 94.75% | 0.00% | 94.75% | 0.00% | 0.00% | 0.0003 | 1000.00 | 6.80 | 6.80 | 1.77 | 42.43 | 7.74 | 0.00 | #DIV/0! | 100% |
| **SCP103** | | | | | | | | | | | | | | | | |
| DYKEM Blue | 7.18 | 94.75% | 0.00% | 94.75% | 0.00% | 0.00% | 0.0003 | 1000.00 | 6.80 | 6.80 | 1.77 | 42.43 | 7.74 | 0.00 | #DIV/0! | 100% |
| **SCP104** | | | | | | | | | | | | | | | | |
| DYKEM Blue | 7.18 | 94.75% | 0.00% | 94.75% | 0.00% | 0.00% | 0.0003 | 1000.00 | 6.80 | 6.80 | 1.77 | 42.43 | 7.74 | 0.00 | #DIV/0! | 100% |

**Total Potential to Emit** **Add worst case coating to all solvents** **6.52** **156.40** **28.54** **0.00**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
Kem Aqua 400 Weight % Volatile (H2O & Organics) = Weight % Water + Weight % Organics

Note:
All coatings contain no HAPs
Weight % Water was calculated by subtracting the amount of organics provided on the SDS by 100%
Weight % Organics were calcuated by adding together the VOC-containing organics provided on the SDS

**Appendix A: Emissions Calculations**
**Degreasing**

**Company Name:** **Matthew Warren Inc.**
**Address:** **500 E. Ottawa Street, Logansport, IN 46947**
**Renewal w/ NSR Permit No.:** **017-39266-00022**
**Reviewer:** **Ethan Horvath**

| Location | Emission Unit | Cleaners | Density (lbs/gal) | Consumption (gal/yr) | Weight Volatiles (%) | VOC PTE (tn/yr) |
|---|---|---|---|---|---|---|
| Plant #1 | PW-1 | Crystal Clean Solvent | 6.75 | 30.00 | 100% | 0.10 |
| | PW-2 | Crystal Clean Solvent | 6.75 | 30.00 | 100% | 0.10 |
| | Millwright Department | Crystal Clean Solvent | 6.75 | 30.00 | 100% | 0.10 |
| | SCP 101 | MEK Solvent | 6.73 | 1825.00 | 100% | 6.14 |
| | SCP 102 | MEK Solvent | 6.73 | 365.00 | 100% | 1.23 |
| | SCP 103 | MEK Solvent | 6.73 | 365.00 | 100% | 1.23 |
| | SCP 104 | MEK Solvent | 6.73 | 365.00 | 100% | 1.23 |
| | WS-72 | WS-72 | 7.68 | 365.00 | 100% | 1.40 |
| Plant #2 | PW-3 | Crystal Clean Solvent | 6.75 | 30.00 | 100% | 0.10 |
| Plant #3 | PW-4 | Crystal Clean Solvent | 6.75 | 182.50 | 100% | 0.62 |
| Plant #5 | PW-5 | Crystal Clean Solvent | 6.75 | 182.50 | 100% | 0.62 |
| | PW-6 | Crystal Clean Solvent | 6.75 | 30.00 | 100% | 0.10 |
| | | | | | **Total** | **12.96** |

**Methodology:**

Consumption (gal/yr) = Amount of Cleaner Used (gal/yr) * 8760 (hr/yr) / Hours of Operation (hr/yr)

VOC PTE (tn/yr) = Density (lbs/gal) * Consumption (gal/yr)* (Weight of Volatiles (%) / 100) / 2000 (lbs/tn)

Density (lb/gal) = Relative Density * Density of Water (kg/$m^3$) * 2.20 (lb/kg) / 264.17 ($m^3$/gal)

**Appendix A: Emissions Calculations**
**Grinding and Shot Peen Operations**

**Company Name:** Matthew Warren Inc.
**Address:** 500 E. Ottawa Street, Logansport, IN 46947
**Renewal w/ NSR Permit No.:** 017-39266-00022
**Reviewer:** Ethan Horvath

| Process/Unit ID | Baghouse ID | Grain Loading (grains/ft$^3$) | Dust Collected (lb/hr) | Gas Flow Rate (acfm) | Gas Flow Rate of Backup Unit (acfm) | Control Efficiency (%) | PM Emission Rate before Control (lb/hr) | Process Weight (tn/hr) | PM Emission Rate before Control (ton/yr) | PM Emission Rate after Control (ton/yr) | PM Emission Rate after Limits (lb/hr) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Plant #1** | | | | | | | | | | | |
| 123H004 | 123H004 | 0.01 | - | 1000 | - | 90% | 0.86 | 0.10 | 3.75 | 0.38 | 0.09 |
| 125F055 | 125X030 | 0.01 | - | 23500 | - | 90% | 20.14 | 10.04 | 88.23 | 8.82 | 2.01 |
| 125F059 | | | | | | | | | | | |
| 125F054 | | | | | | | | | | | |
| 125F056 | | | | | | | | | | | |
| 336F001 | | | | | | | | | | | |
| 125F057 | 125X031 | 0.01 | - | 23500 | - | 90% | 20.14 | 10.04 | 88.23 | 8.82 | 2.01 |
| 125F076 | 125X032 | 0.01 | - | 40832 | - | 90% | 35.00 | 22.37 | 153.29 | 15.33 | 3.50 |
| 125F070 | | | | | | | | | | | |
| 125F031 | | | | | | | | | | | |
| 127F035 | | | | | | | | | | | |
| 125F022 | | | | | | | | | | | |
| 127H001 | | | | | | | | | | | |
| 125F039 | | | | | | | | | | | |
| 125F027 | | | | | | | | | | | |
| 125F021 | | | | | | | | | | | |
| 125F034 | | | | | | | | | | | |
| 125F023 | | | | | | | | | | | |
| 125F019 | | | | | | | | | | | |
| 125F020 | | | | | | | | | | | |
| 125F044 | | | | | | | | | | | |
| 125F069 | | | | | | | | | | | |
| 127U004 | | | | | | | | | | | |
| 127F014 | | | | | | | | | | | |
| 127F018 | | | | | | | | | | | |
| 125F041 | N/A | - | 0.034 | - | - | 0.00% | 0.03 | 0.001 | 0.15 | - | - |
| 137H011 | 533X005 | 0.01 | - | 16000 | - | 90% | 13.71 | 5.75 | 60.07 | 6.01 | 1.37 |
| 137H012 | | | | | | | | | | | |
| 137H013 | | | | | | | | | | | |
| 137H001 | | | | | | | | | | | |
| 137H010 | | | | | | | | | | | |
| BS1 | N/A | - | 0.01 | - | - | 0% | 0.01 | 0.0002 | 0.05 | - | - |
| FD1 | | | | | | | | | | | |
| MS1 | | | | | | | | | | | |
| MS2 | | | | | | | | | | | |
| SG1 | | | | | | | | | | | |
| WG1 | N/A | - | 0.01 | - | - | 0% | 0.01 | 0.0002 | 0.04 | - | - |
| SG2 | | | | | | | | | | | |
| SG3 | | | | | | | | | | | |
| CS1 | | | | | | | | | | | |
| 340H002 | 340X027 | 0.03 | - | 900 | - | 90% | 2.31 | 0.44 | 10.14 | 1.01 | 0.23 |
| **Plant #2** | | | | | | | | | | | |
| 122F11 | 122X01 | 0.03 | - | 100 | - | 99% | 2.57 | 0.51 | 11.26 | 0.11 | 0.03 |
| 122F04 | | | | | | | | | | | |
| 533F032 | 230X023 | 0.01 | - | 21672 | - | 90% | 18.58 | 8.93 | 81.36 | 8.14 | 1.86 |
| 533F037 | | | | | | | | | | | |
| 230H16 | | | | | | | | | | | |
| 230H17 | | | | | | | | | | | |
| 533H011 | | | | | | | | | | | |
| 203H001 | | | | | | | | | | | |
| 130U010 | | | | | | | | | | | |
| 130H012 | 230X024 | 0.01 | - | 3000 | - | 90% | 2.57 | 0.51 | 11.26 | 1.13 | 0.26 |
| 533U001 | MDC | 0.03 | - | 1300 | - | 90% | 3.34 | 0.74 | 14.64 | 1.46 | 0.33 |
| 533U010 | | | | | | | | | | | |
| **Plant #3** | | | | | | | | | | | |
| 336H001 | 336X003/336X002* | 0.01 | - | 40000 | 17500 | 90% | 34.29 | 21.71 | 150.17 | 15.02 | 3.43 |
| 336H003 | | | | | | | | | | | |
| 336H005 | | | | | | | | | | | |
| 336F007 | | | | | | | | | | | |
| 336F008 | | | | | | | | | | | |
| 336F010 | | | | | | | | | | | |
| 336F002 | 336X002/336X003* | 0.01 | - | 17500 | 40000 | 90% | 34.29 | 21.71 | 150.17 | 15.02 | 3.43 |
| 336F003 | | | | | | | | | | | |
| 336F004 | | | | | | | | | | | |
| 336F005 | | | | | | | | | | | |
| 125F053** | | | | | | | | | | | |
| 336H004 | 336X001 | 0.01 | - | 6500 | - | 90% | 5.57 | 1.56 | 24.40 | 2.44 | 0.56 |
| 336F006 | | | | | | | | | | | |
| 336F007 | | | | | | | | | | | |
| 336F009 | | | | | | | | | | | |
| 340F027 | N/A | - | 0.034 | - | - | 0.00% | 0.03 | 0.001 | 0.15 | - | - |
| **Plant #5** | | | | | | | | | | | |
| 550H002 | 550X07 | 0.03 | - | 765 | - | 99% | 19.67 | 9.71 | 86.16 | 0.86 | 0.20 |
| 550H001 | 550X002 | 0.01 | - | 935 | - | 90% | 0.80 | 0.09 | 3.51 | 0.35 | 0.08 |
| 550H005 | 550X007 | 0.01 | - | 2500 | - | 90% | 2.14 | 0.39 | 9.39 | 0.94 | 0.21 |
| 550H007 | 550X008 | 0.01 | - | 1500 | - | 99% | 12.86 | 5.24 | 56.31 | 0.56 | 0.13 |
| | 550X009 | 0.01 | - | 2870 | - | 99% | 24.60 | 13.42 | 107.75 | 1.08 | 0.25 |
| 550F001 | 550X010 | 0.01 | - | 765 | - | 90% | 0.66 | 0.07 | 2.87 | 0.29 | 0.07 |
| | **Total** | | | | | | | | **1046.82** | **87.59** | |

**Methodology:**
PM Emission Rate before Control (ton/yr) = Grain Loading (grains/ft$_3$) * Gas Flow Rate (acfm) / (1-Control Efficiency (%)) / 7000 (grains/lb) * 60 (min/hr) * 8760 (hr/yr) / 2000 (lb/tn)
PM Emission Rate after Control (ton/yr) = Grain Loading (grains/ft$_3$) * Gas Flow Rate (acfm) / 7000 (grains/lb) * 60 (min/hr) * 8760 (hr/yr) / 2000 (lb/tn)
Process Weight (tn/hr) = 0.69·√(PM Emissions Rate before Control (lb/hr) / 4.10)

Note:
*336X003 acts as the main baghouse for the first set of units and back for the second set. 336X002 acts as the main baghouse for the second set of units and backup to the first set.
**Wheel grinder 125F053 exhausts solely to baghouse 336X002

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

**Company Name:** Matthew Warren Inc.
**Address:** 500 E. Ottawa Street, Logansport, IN 46947
**Renewal w/ NSR Permit No.:** 017-39266-00022
**Reviewer:** Ethan Horvath

| Unit ID | Heat Input Capacity (MMBtu/hr) |
|---|---|
| **Plant #1** | |
| OV-1 | 2.00 |
| 135L003 | 0.53 |
| 135L009 | 1.00 |
| 135L008 | 0.18 |
| 135L007 | 0.50 |
| **Plant #2** | |
| 330L010 | 1.00 |
| 330K012 | 1.00 |
| 130J017 | 2.00 |
| 130J016 | 1.50 |
| 130J011 | 4.10 |
| 130L026 | 2.00 |
| 533L021 | 1.00 |
| 533L020 | 0.80 |
| 130J024 | 3.00 |
| 533J025 | 3.00 |
| **Plant #3** | |
| 352L010 | 0.20 |
| 336L002 | 2.00 |
| 336H001 | 0.50 |
| 336H002 | 0.50 |
| **Plant #5** | |
| 550L001 | 1.20 |
| 550L003 | 1.20 |
| 550L005 | 1.20 |
| **Plant #6** | |
| 628H002 | 1.75 |
| 628H004 | 0.95 |
| 628L001 | 1.50 |
| 628L002 | 2.50 |
| 628J001 | 0.95 |
| 628J001 Thermal Oxidizer | 0.56 |

| | Heat Input Capacity MMBtu/hr | HHV mmBtu/mmscf | Potential Throughput MMCF/yr |
|---|---|---|---|
| New Units | 5.00 | 1020 | 42.94 |
| Total | 38.6 | | 331.7 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| Emission Factor in lb/MMCF | PM* 1.9 | PM10* 7.6 | direct PM2.5* 7.6 | SO2 0.6 | NOx 100 **see below | VOC*** 5.5 | CO*** 84 |
| New Units Potential Emissions in tons/yr | 0.04 | 0.16 | 0.16 | 0.01 | 2.15 | 0.12 | 1.80 |
| **Total Potential Emission in tons/yr** | **0.32** | **1.26** | **1.26** | **0.10** | **16.58** | **0.91** | **13.93** |

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

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

**Hazardous Air Pollutants (HAPs)**

| | HAPs - Organics | | | | | |
|---|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene | **Total - Organics** |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 | |
| New Units Potential Emission in tons/yr | 4.5E-05 | 2.6E-05 | 1.6E-03 | 3.9E-02 | 7.3E-05 | |
| Total Potential Emission in tons/yr | 3.5E-04 | 2.0E-04 | 1.2E-02 | 0.30 | 5.6E-04 | **0.31** |

| | HAPs - Metals | | | | | |
|---|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel | **Total - Metals** |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 | |
| New Units Potential Emission in tons/yr | 1.1E-05 | 2.4E-05 | 3.0E-05 | 8.2E-06 | 4.5E-05 | |
| Total Potential Emission in tons/yr | 8.3E-05 | 1.8E-04 | 2.3E-04 | 6.3E-05 | 3.5E-04 | **9.1E-04** |
| Methodology is the same as above. | | | | | **Total HAPs** | **0.31** |
| The five highest organic and metal HAPs emission factors are provided above. | | | | | **Worst HAP** | **0.30** |
| Additional HAPs emission factors are available in AP-42, Chapter 1.4. | | | | | | |

**Appendix A: Emissions Calculations**
**Powder Coating Operations**

**Company Name:** **Matthew Warren Inc.**
**Address:** **500 E. Ottawa Street, Logansport, IN 46947**
**Renewal w/ NSR Permit No.:** **017-39266-00022**
**Reviewer:** **Ethan Horvath**

| Material | Powder Usage (lb/part) | Maximum Product Coated (part/hour) | Particulate Potential (lb/hour) | Uncontrolled Particulate PM Potential (ton/yr) | Controlled Particulate PM Potential (ton/yr) | Transfer Efficiency | % as PM* | Control Efficiency (%)** |
|---|---|---|---|---|---|---|---|---|
| Nylon Powder | 0.00008 | 2220 | 0.02 | 0.10 | 2.92E-04 | 50% | 25% | 99.7% |

**Note:**

* It is probable that most of the powder is too large to be classifiable as particulate matter. However, OAQ will assume 25% of emissions are classifiable as particulate matter as a conservative estimate. This determination was made with MSM 071-13876-00036, issued April 10, 2001, for booth EPEC1. This methodology was then carried through with the addition of unpermitted booth EPEC2 in 2004 with Renewal No. 071-17648-00036, WPEC1 in Administrative Amendment No. 071-18419-00036, issued on January 12, 2004, and unpermitted booth EPEC3 in 2018 in MSM 071-39140-00036.

**The powder coating application system is equipped with an integral dry cartridge filter.

Assume PM = PM10 = PM2.5

Transfer Efficiency is assumed to be 0% for worst case emissions.

**Methodology**

Particulate Potential (lb/hour) = Powder Usage (lb/hour) * (1-Transfer Efficiency%)

Particulate Potential (tons/yr) = Particulate Potential (lb/hour) *(8760 hrs/yr) *(1 ton/2000 lbs)

Process Weight Rate (lb/hr) = Powder Usage (lb/hour) + Max. Product Coated (lb/hour)

Process Weight Rate (tons/hr) = Process Weight Rate (lb/hr) *(1 ton/2000 lbs)

PM Limit (lb/hour) = 4.10 * (Process Weight Rate (ton/hr))^0.67

PM Limit (tons/yr) = PM Limit (lb/hour) *(8760 hrs/yr) *(1 ton/2000 lbs)

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

**Company Name:** **Matthew Warren Inc.**
**Address:** **500 E. Ottawa Street, Logansport, IN 46947**
**Renewal w/ NSR Permit No.:** **017-39266-00022**
**Reviewer:** **Ethan Horvath**

| FLAME CUTTING | 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) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | PM = PM10 | Mn | Ni | Cr | PM = PM10 | Mn | Ni | Cr | |
| **Plant #5** | | | | | | | | | | | | |
| Oxyacetylene | 4 | 0.6 | 5 | 0.1622 | 0.0005 | 0.0001 | 0.0003 | 0.117 | 0.000 | 7.20E-05 | 2.16E-04 | 6.48E-04 |
| | | | | | | | | | | | | |
| **Plant #1** | | | | | | | | | | | | |
| Oxyacetylene | 4 | 0.6 | 5 | 0.1622 | 0.0005 | 0.0001 | 0.0003 | 0.117 | 0.000 | 7.20E-05 | 2.16E-04 | 6.48E-04 |
| | | | | | | | | | | | | |
| EMISSION TOTALS | | | | | | | | | | | | |
| Potential Emissions lbs/hr | | | | | | | | 0.23 | 0.00 | 0.00 | 0.00 | 1.30E-03 |
| Potential Emissions lbs/day | | | | | | | | 5.61 | 0.02 | 3.46E-03 | 1.04E-02 | 3.11E-02 |
| Potential Emissions tons/year | | | | | | | | 1.02 | 3.15E-03 | 6.31E-04 | 1.89E-03 | 5.68E-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 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.

Note:
The flame cutting at the source is not continuous and is only used once a day. Therefore, the cutting rate has been conservatively estimated at 5 (in/min).

## Appendix A: Emission Calculations
## Ink Stamping

**Company Name:** **Matthew Warren Inc.**
**Address:** **500 E. Ottawa Street, Logansport, IN 46947**
**Renewal w/ NSR Permit No.:** **017-39266-00022**
**Reviewer:** **Ethan Horvath**

| Operation | Chemical | Maximum Usage (lb/hr) | Percent VOC (%) | Potential VOC (ton/yr) |
|---|---|---|---|---|
| Department 119, Segment 1 Ink application | Carco F-123 | 0.11 | 75.0% | 0.36 |
| Department 135, Section P Paint usage | DYKEM Blue | 6.85E-04 | 95.0% | 2.85E-03 |
| | | | **Total** | **0.36** |

**Methodology:**
Potential VOC (ton/yr) = Maximum Usage (lb/hr) * Percent VOC (%) * 8760 (hr/yr) / 2000 (lb/tn)

Notes:
Transfer efficiency is 100%, therefore there are no particulates emitted.

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

**Company Name:** Matthew Warren Inc.
**Address:** 500 E. Ottawa Street, Logansport, IN 46947
**Renewal w/ NSR Permit No.:** 017-39266-00022
**Reviewer:** Ethan Horvath

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

Vehicle Informtation (provided by source)

| Type | Maximum number of vehicles per day | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight Loaded (tons/trip) | Total Weight driven per day (ton/day) | Maximum one-way distance (feet/trip) | Maximum one-way distance (mi/trip) | Maximum one-way miles (miles/day) | Maximum one-way miles (miles/yr) |
|---|---|---|---|---|---|---|---|---|---|
| Plant #1 | | | | | | | | | |
| Vehicle (entering plant) | 8.0 | 1.0 | 8.0 | 40.0 | 320.0 | 45 | 0.009 | 0.1 | 24.9 |
| Vehicle (leaving plant) | 8.0 | 1.0 | 8.0 | 40.0 | 320.0 | 45 | 0.009 | 0.1 | 24.9 |
| Plant #2 | | | | | | | | | |
| Vehicle (entering plant) | 8.0 | 1.0 | 8.0 | 40.0 | 320.0 | 70 | 0.013 | 0.1 | 38.7 |
| Vehicle (leaving plant) | 8.0 | 1.0 | 8.0 | 40.0 | 320.0 | 70 | 0.013 | 0.1 | 38.7 |
| Plant #3 | | | | | | | | | |
| Vehicle (entering plant) | 8.0 | 1.0 | 8.0 | 40.0 | 320.0 | 75 | 0.014 | 0.1 | 41.5 |
| Vehicle (leaving plant) | 8.0 | 1.0 | 8.0 | 40.0 | 320.0 | 75 | 0.014 | 0.1 | 41.5 |
| Plant #5 | | | | | | | | | |
| Vehicle (entering plant) | 8.0 | 1.0 | 8.0 | 40.0 | 320.0 | 170 | 0.032 | 0.3 | 94.0 |
| Vehicle (leaving plant) | 8.0 | 1.0 | 8.0 | 40.0 | 320.0 | 170 | 0.032 | 0.3 | 94.0 |
| Plant #6 | | | | | | | | | |
| Vehicle (entering plant) | 8.0 | 1.0 | 8.0 | 40.0 | 320.0 | 50 | 0.009 | 0.1 | 27.7 |
| Vehicle (leaving plant) | 8.0 | 1.0 | 8.0 | 40.0 | 320.0 | 50 | 0.009 | 0.1 | 27.7 |
| | | **Totals** | **80.0** | | **3200.0** | | | **1.2** | **453.5** |

Average Vehicle Weight Per Trip = 40.0 tons/trip
Average Miles Per Trip = 0.02 miles/trip

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

| | PM | PM10 | PM2.5 | |
|---|---|---|---|---|
| where k = | 0.011 | 0.0022 | 0.00054 | lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1) |
| W = | 40.0 | 40.0 | 40.0 | tons = average vehicle weight (provided by source) |
| sL = | 9.7 | 9.7 | 9.7 | g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

| | PM | PM10 | PM2.5 | |
|---|---|---|---|---|
| Unmitigated Emission Factor, Ef = | 3.745 | 0.749 | 0.1838 | lb/mile |
| Mitigated Emission Factor, Eext = | 3.424 | 0.685 | 0.1681 | lb/mile |

| Process | Mitigated PTE of PM (Before Control) (tons/yr) | Mitigated PTE of PM10 (Before Control) (tons/yr) | Mitigated PTE of PM2.5 (Before Control) (tons/yr) |
|---|---|---|---|
| Plant #1 | | | |
| Vehicle (entering plant) | 0.04 | 0.01 | 0.00 |
| Vehicle (leaving plant) | 0.04 | 0.01 | 0.00 |
| Plant #2 | | | |
| Vehicle (entering plant) | 0.07 | 0.01 | 0.00 |
| Vehicle (leaving plant) | 0.07 | 0.01 | 0.00 |
| Plant #3 | | | |
| Vehicle (entering plant) | 0.07 | 0.01 | 0.00 |
| Vehicle (leaving plant) | 0.07 | 0.01 | 0.00 |
| Plant #5 | | | |
| Vehicle (entering plant) | 0.16 | 0.03 | 0.01 |
| Vehicle (leaving plant) | 0.16 | 0.03 | 0.01 |
| Plant #6 | | | |
| Vehicle (entering plant) | 0.05 | 0.01 | 0.00 |
| Vehicle (leaving plant) | 0.05 | 0.01 | 0.00 |
| **Totals** | **0.78** | **0.16** | **0.04** |

**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 (Before Control) (tons/yr) | = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs) |
| Mitigated PTE (After Control) (tons/yr) | = [Mitigated PTE (Before Control) (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**
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**Eric J. Holcomb**
*Governor*

**Bruno L. Pigott**
*Commissioner*

November 21, 2018

Robert Wise
Matthew Warren, Inc.
500 East Ottawa Street
Logansport, Indiana 46947

Re: Public Notice
Matthew Warren, Inc.
Permit Level: FESOP Renewal/Significant NSR
Permit Number: 017-39266-00022

Dear Mr. Wise:

Enclosed is a copy of your draft FESOP Renewal/Significant New Source Review, 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 *Pharos Tribune* in Logansport, Indiana publish the abbreviated version of the public notice no later than November 27, 2018. 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 Logansport Public Library 616 East Broadway in Logansport, 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 Ethan Horvath, 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 3-8397 or dial (317) 233-8397.

Sincerely,

*John F. Jackson*

John F. Jackson
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017

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**Eric J. Holcomb**
*Governor*

**Bruno L. Pigott**
*Commissioner*

**ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

November 21, 2018

Pharos Tribune
517 East Broadway
P.O. Box 210
Logansport, Indiana 46947

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Matthew Warren, Inc., Cass 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 November 27, 2018

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 John Jackson at 800-451-6027 and ask for extension 3-1449 or dial 317-233-1449.

Sincerely,

*John F. Jackson*

John F. Jackson
Permit Branch
Office of Air Quality

Permit Level: FESOP Renewal/Significant New Source Review
Permit Number: 017-39366-00022

Enclosure

PN Newspaper Letter 8/22/2018

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*Governor*
**Bruno L. Pigott**
*Commissioner*

November 21, 2018

To: Logansport Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

**Applicant Name: Matthew Warren, Inc.**
**Permit Number: 017-39266-00022**

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 1/9/2017

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
*We Protect Hoosiers and Our Environment.*
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Eric J. Holcomb**
*Governor*

**Bruno L. Pigott**
*Commissioner*

Notice of Public Comment

**November 21, 2018**
**Matthew Warren, Inc.**
**017-39266-00022**

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 Letter 1/9/2017

# Mail Code 61-53

| IDEM Staff | JJACKSON 11/21/2018<br>Matthew Warren Inc 017-39266-00022 (draft) | | |
|---|---|---|---|
| Name and address of Sender | ▶ | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br>**CERTIFICATE OF MAILING ONLY** |

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|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | Robert Wise Matthew Warren Inc 500 E Ottawa St Logansport IN 46947 (Source CAATS) | | | | | | | | | |
| 2 | | Scottie Pennington Plant Manager Matthew Warren Inc 500 E Ottawa St Logansport IN 46947 *(RO CAATS)* | | | | | | | | | |
| 3 | | Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 *(Affected Party)* | | | | | | | | | |
| 4 | | Cass County Board of Commissioner 200 Court Park Logansport IN 46947 *(Local Official)* | | | | | | | | | |
| 5 | | Cass County Health Department 512 High Street Logansport IN 46947-2766 *(Health Department)* | | | | | | | | | |
| 6 | | Logansport Cass Co Public Library 616 E Broadway Logansport IN 46947-3187 *(Library)* | | | | | | | | | |
| 7 | | Logansport City Council and Mayors Office 601 Broadway Logansport IN 46947 *(Local Official)* | | | | | | | | | |
| 8 | | Kurt Brandstatter Central Paving, Inc. P.O. Box 357 Logansport IN 46947 *(Affected Party)* | | | | | | | | | |
| 9 | | Tony DeMarco BCA Environmental Consultants, LLC 224 West Jefferson Blvd., Suite 204 South Bend IN 46601 *(Consultant)* | | | | | | | | | |
| 10 | | Christina Seiler The Rochester Sentinel PO Box 260 Rochester IN 46975 *(Affected Party)* | | | | | | | | | |
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