

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

**Indiana Precision Technology
400 West New Road
Greenfield, Indiana 46140**

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

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 and 326 IAC 2-1-3.2, 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.

Operation Permit No.: F059-9160-00013	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance 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 Management (OAM) and presented in the permit application.

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

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

Responsible Official: Raymond E. Lindsey
Source Address: 400 West New Road, Greenfield, Indiana 46140
Mailing Address: 400 West New Road, Greenfield, Indiana 46140
SIC Code: 3714
County Location: Hancock
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;

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:

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 2,312 pounds of aluminum ingots and flux per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);
- (2) Eleven (11) shell core sand molding machines, eighteen (18) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines, identified as Unit 2, with a maximum capacity of 3,608 pounds of aluminum and sand per hour, using three (3) baghouses as control, exhausting to three (3) stacks (EF-49, EF-101, and EF-107);
- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of 10,000 pounds of Zinc Shot per year, which exhausts inside the plant;
- (4) Mineral sprits machining and washing operations, identified as Unit 4, using one (1) Durr thermal oxidizer as control;
- (5) Machining operations, identified as Unit 5, using a mist collector as control, exhausting to one (1) stack (EF-44);
- (6) One (1) Electronic Control Unit (ECU) assembly operation, consisting of solder, resin and assembly operations, identified as Unit 6;
- (7) One (1) Electronic Control Unit (ECU) maintenance operation, consisting of cleaning and repairing operations, identified as Unit 7; and
- (8) One (1) maintenance and production cleaning operation, identified as Unit 8.

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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 6.0 million British thermal units per hour (mmBtu/hr) natural gas fired boiler;

- (2) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (3) VOC and HAP storage vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (4) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
- (5) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (6) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (9) Closed loop heating and cooling systems;
- (10) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (11) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
- (12) Natural draft cooling towers not regulated under a NESHAP;
- (13) Quenching operations used with heat treating processes;
- (14) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (15) Heat exchanger cleaning and repair;
- (16) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (17) Paved and unpaved roads and parking lots with public access;
- (18) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
- (19) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower;
- (20) On-site fire and emergency response training approved by the department;

- (21) Stationary fire pumps;
- (22) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measure at 38 degrees C); and

- (23) A laboratory as defined in 326 IAC 2-7-1(20)(C);
- (24) T-6 Machines (2) (Casting Reheater & Quench Bath);
- (25) Impregnation;
- (26) Two (2) Chemical Shotblast (Die Repair);
- (27) Sand storage;
- (28) Water based coolants - mist collector;
- (29) Cutting Oils - mist collector;
- (30) Injector heat age;
- (31) Chromate system;
- (32) Injection Molding;
- (33) Shakeout (Foundry); and

- (34) Three (3) mineral spirits storage tanks with capacities of 1,500 gallons, 1,500 gallons, and 3,000 gallons.

A.4 FESOP Applicability [326 IAC 2-8-2]

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

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

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.

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM within a reasonable time, any information that IDEM, OAM 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.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required

to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM 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.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; and
- (3) Denial of a permit renewal application.

(b) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(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, OAM on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The 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, IDEM, OAM may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

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 describes 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, OAM 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM 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, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance 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 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 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 FESOP 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)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM 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, OAM 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, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 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, OAM 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).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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, OAM on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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, OAM 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 in writing by IDEM, OAM any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F), except as provided by 326 IAC 2-8-11(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every

relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, review by affected states and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in 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(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
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, OAM or U.S. EPA is required.
- (e) 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.24 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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 from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day 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 three hundred sixty-five (365) consecutive day 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 three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21).
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

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

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

(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

**C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

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

C.9 Performance Testing [326 IAC 3-2.1]

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days before the intended test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Temperature Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop or temperature across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

C.14 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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 insure 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
- (3) 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

C.16 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was

not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.18 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

-
- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the permit requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (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, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 2,312 pounds of aluminum ingots and flux per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);
- (2) Eleven (11) shell core sand molding machines, eighteen (18) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines, identified as Unit 2, with a maximum capacity of 3,608 pounds of aluminum and sand per hour, using three (3) baghouses as control, exhausting to three (3) stacks (EF-49, EF-101, and EF-107);
- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of 10,000 pounds of Zinc Shot per year, which exhausts inside the plant;

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations):

- (a) The particulate matter (PM) emissions from the eight (8) aluminum furnaces (Unit 1) shall be limited to 4.52 pounds per hour.
- (b) The particulate matter (PM) emissions from the eleven (11) shell core sand molding machines, eighteen (18) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines (Unit 2) shall be limited to 6.08 pounds per hour, and
- (c) The particulate matter (PM) emissions from the one (1) throttle body shotblast (Unit 3) shall be limited as established in the following equation:

These limits are based on the following equation:

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

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

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

D.1.3 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

- (a) The wet scrubber for PM control shall be in operation at all times when the eight (8) aluminum furnaces (Unit 1) are in operation.
- (b) The three (3) baghouses for PM control shall be in operation at all times when the eleven

(11) shell core sand molding machines, eighteen (18) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines (Unit 2) are in operation.

D.1.4 Visible Emissions Notations

- (a) Daily visible emission notations of the eight (8) aluminum furnaces, eleven (11) shell core sand molding machines, eighteen (18) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines stack exhausts shall be performed once per operating 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the three (3) baghouses used in conjunction with the eleven (11) shell core sand molding machines, eighteen (18) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines, at least once daily when the eleven (11) shell core sand molding machines, eighteen (18) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the three (3) baghouses shall be maintained within the range of 2.0 and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

D.1.6 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.1.7 Wet Scrubber Inspections

An inspection shall be performed each calendar quarter of the wet scrubber controlling the eight (8) aluminum furnaces.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the eight (8) aluminum furnaces, eleven (11) shell core sand molding machines, eighteen (18) aluminum casting machines, one (1) die maintenance area and nine (9) core knockout machines stack exhausts.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.

- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

- (4) Mineral spirits machining and washing operations, identified as Unit 4, using one (1) Durr thermal oxidizer as control;
 - (5) Machining operations, identified as Unit 5, using a mist collector as control, exhausting to one (1) stack (EF-44);
 - (6) One (1) Electronic Control Unit (ECU) assembly operation, consisting of solder, resin and assembly operations, identified as Unit 6;
 - (7) One (1) Electronic Control Unit (ECU) maintenance operation, consisting of cleaning and repairing operations, identified as Unit 7; and
 - (8) One (1) maintenance and production cleaning operation, identified as Unit 8.
- (Insignificant Activity) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (Insignificant Activity) Three (3) mineral spirits storage tanks with capacities of 1,500 gallons, 1,500 gallons, and 3,000 gallons.

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

D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) The mineral spirits machining and washing operations shall be limited to 13,387 gallons of mineral spirits usage per month.
- (b) The Durr thermal oxidizer shall be in operation at all times the mineral spirits machining and washing operations are in operation. The thermal incinerator shall maintain a minimum operating temperature of 1,400°F, or a temperature determined in the compliance tests to maintain a minimum overall 85% destruction of potential VOC emissions.
- (c) These limitations are equivalent to potential to emit (PTE) volatile organic compounds (VOC) of seventy-four and seven tenths (74.7) tons per year. This limitation will make 326 IAC 2-7 (Part 70) not applicable.

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the mineral spirits machining and washing operations (Unit 4) and degreasing operations (Insignificant Activity) shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-3-5]

-
- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the mineral spirits machining and washing operations (Unit 4) and degreasing operations (Insignificant Activity) shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.

- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (c) The use of the Durr thermal oxidizer shall satisfy the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control).

D.2.4 Volatile Organic Compound (VOC)

Any change or modification to the machining operation (Unit 5), the ECU assembly operation (Unit 6), the ECU maintenance operation (Unit 7) and the maintenance and production operation (Unit 8) that would lead to an increase in volatile organic compound (VOC) emissions above twenty-five (25) tons per year, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-8-5(1)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing for the Durr Thermal Oxidizer utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner to ensure a minimum overall destruction efficiency of 85 percent. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

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

D.2.7 Volatile Organic Compound (VOC)

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), Operation Permit (OP 30-03-93-0069) issued on March 13, 1989 and Registration (CP 059-8152-00013) issued on February 28, 1997:

- (a) The mineral spirits machining and washing operations (Unit 4) shall operate at an 85% overall control efficiency at all times.
- (b) When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,350°F, or a temperature determined in the compliance tests to maintain a minimum overall 85% destruction of potential VOC emissions.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

- (a) To ensure compliance with Condition D.2.1, the Permittee shall keep monthly records of mineral spirits usage.
- (b) To ensure compliance with Condition D.2.7, the Permittee shall keep daily records of the thermal oxidizer operating temperature.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

(Insignificant Activity)	One (1) 6.0 million British thermal units per hour (mmBtu/hr) natural gas fired boiler;
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Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for facilities specified in 326 IAC 6-2-1(d)), the 6.0 mmBtu/hr boiler shall be limited to 0.6 pounds per million British thermal unit. This limitation is used because the calculated limitation was greater than 0.6 pounds per million British thermal unit.

The calculated limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (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 operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

Compliance Determination Requirement

D.3.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

D.3.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Indiana Precision Technology
Source Address: 400 West New Road, Greenfield, Indiana 46140
Mailing Address: 400 West New Road, Greenfield, Indiana 46140
FESOP No.: F059-9160-00013

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:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 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 MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Indiana Precision Technology
Source Address: 400 West New Road, Greenfield, Indiana 46140
Mailing Address: 400 West New Road, Greenfield, Indiana 46140
Part 70 Permit No.: F059-9160-00013

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
CThe Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Indiana Precision Technology
Source Address: 400 West New Road, Greenfield, Indiana 46140
Mailing Address: 400 West New Road, Greenfield, Indiana 46140
FESOP No.: F059-9160-00013
Facility: one (1) mineral spirits machining and washing operation
Parameter: volatile organic compound (VOC)
Limit: 13,387 gallons of mineral spirits per month. The thermal oxidizer shall maintain a minimum overall 85% destruction efficiency.

YEAR: _____

Month	Mineral Spirit Usage this month (gal/month)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY COMPLIANCE REPORT**

Source Name: Indiana Precision Technology
 Source Address: 400 West New Road, Greenfield, Indiana 46140
 Mailing Address: 400 West New Road, Greenfield, Indiana 46140
 FESOP No.: F059-9160-00013

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

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

Source Background And Description

Source Name: Indiana Precision Technology
Source Location: 400 West New Road, Greenfield, Indiana 46140
County: Hancock
SIC Code: 3714
Operation Permit No.: F059-9160-00013
Permit Reviewer: Cathie Moore

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Indiana Precision Technology pertaining to the operation of automotive components manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 2,312 pounds of aluminum ingots per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);
- (2) Three (3) core sand mixing machines, eight (8) core sand molding machines and four (4) core knockout machines, identified as Unit 2, with a maximum capacity of 1,201 pounds of aluminum and flux per hour, using three (3) baghouses as control, exhausting to three (3) stacks (EF-49, EF-101, and EF-107);
- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of 353 pounds of aluminum per hour, exhausting to one (1) stack (EF-49);
- (4) One (1) mineral sprits machining and washing operation, including four cold cleaner degreasers and three (3) mineral spirits storage tanks with capacities of 1,500 gallons, 1,500 gallons and 3,000 gallons, identified as Unit 4, using one (1) Durr thermal oxidizer as control;
- (5) One (1) machining operation, identified as Unit 5, using a mist collector as control, exhausting to one (1) stack (EF-44);
- (6) One (1) Electronic Control Unit (ECU) assembly operation, consisting of solder, resin and assembly operations, identified as Unit 6;
- (7) One (1) Electronic Control Unit (ECU) maintenance operation, consisting of cleaning and repairing operations, identified as Unit 7; and
- (8) One (1) maintenance and production cleaning operation, identified as Unit 8.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 6.0 million British thermal units per hour (mmBtu/hr) natural gas fired boiler;
- (2) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (3) VOC and HAP storage vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (4) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
- (5) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (6) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (9) Closed loop heating and cooling systems;
- (10) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (11) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
- (12) Natural draft cooling towers not regulated under a NESHAP;
- (13) Quenching operations used with heat treating processes;

- (14) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (15) Heat exchanger cleaning and repair;
- (16) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (17) Paved and unpaved roads and parking lots with public access;
- (18) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
- (19) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower;
- (20) On-site fire and emergency response training approved by the department;
- (21) Stationary fire pumps;
- (22) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measure at 38 degrees C); and
- (23) A laboratory as defined in 326 IAC 2-7-1(20)(C);
- (24) T-6 Machines (2) (Casting Reheater & Quench Bath);
- (25) Impregnation (Cement Dipping);
- (26) Two (2) Chemical Shotblast (Die Repair);
- (27) Sand storage;
- (28) Water based coolants - mist collector;
- (29) Cutting Oils - mist collector;
- (30) Injector heat age;
- (31) Chromate system;
- (32) Injection Molding; and
- (33) Shakeout (Foundry).

Existing Approvals

This source has been operating under previous approvals including, but not limited to, the following:

- (1) Operation Permit (OP 30-03-93-0069), issued on March 13, 1989.
- (2) Registration (CP 059-2541), issued on June 2, 1992.
- (3) Exemption (CP 059-3506), issued March 12, 1994.
- (4) Registration (CP 059-5161), issued on February 12, 1996.
- (5) Registration (CP 059-8152), issued on February 28, 1997.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on October 29, 1997. Additional information was received on December 10, 1997.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential Emissions (tons/year)
Toluene	less than 10
TOTAL	less than 25

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1993 emission data.

Pollutant	Actual Emissions (tons/year)
PM	6.216
PM-10	3.758
SO ₂	1.301
VOC	0.289
CO	0.000
NO _x	1.099

No previous hazardous air pollutant (HAP) emission data has been received from the source.

Limited Potential To Emit

- (a) The source has accepted a federally enforceable limit on potential to emit volatile organic compound (VOC) of 99 tons per year, consisting of:
 - (i) Ninety-eight (98) tons per year for the significant activities; and
 - (ii) One (1) ton per year for the insignificant activities.
- (b) The source has accepted a limit on potential to emit of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited Potential to Emit (tons/year)
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Process/ facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Units 1-8	-	-	-	98.0	-	-	24.0
Insignificant Activities	-	-	-	1.0	-	-	-
Total Emissions	-	-	-	99.0	-	-	24.0

County Attainment Status

The source is located in Hancock County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Hancock County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The 6.0 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, constructed in 1988, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40b, Subpart Db), because of the maximum heat input capacity is less than then ten (10) million British thermal units per hour.
- (b) The mineral spirits storage tanks (part of Unit 4) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 110b, Subpart Kb), because their capacities are less than forty (40) cubic meters.
- (c) The mineral sprits machining and washing operation (Unit 4) and the degreasing operations (Insignificant Activity) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63.460 Subpart T because they do not use and of the solvents listed in this rule.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The one (1) mineral spirits machining and washing operation is required to have a Preventive

Maintenance Plan (PMP). The source has stated that the Preventive Maintenance Plan has been drafted and is available upon request.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the limited potential volatile organic compound (VOC) emissions are ninety-nine (99) tons per year. This also makes the requirements of 326 IAC 2-7 (Part 70) not applicable.

326 IAC 2-6 (Emission Reporting)

Since this source is located in Hancock County and the potential to emit volatile organic compounds (VOC) is less than one hundred (100) tons per year, 326 IAC 2-6 does not apply. Since this source is not one of the 28 listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year when added to fugitive emissions, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-8 (FESOP)

Pursuant to 326 IAC 2-8 (FESOP) the potential volatile organic compound (VOC) emission for the one (1) mineral spirits machining and washing operation (Unit 4) shall be limited to seventy-nine (79) tons per year. The mineral spirit usage shall be limited to 1,828 gallons of mineral spirits per month. This limit is used because all of the significant emission units are limited to ninety-eight (98) tons per year and the potential emissions of all other significant emission units are nineteen (19) tons per year.

The mineral spirit usage limitation is based on the following calculations:

98 tons VOC/year for all significant emission units - 19 tons VOC/year for all emission units except Unit 4 = 79 tons VOC/year for Unit 4

79 tons VOC/year * 2000 lb/ton * 1 gallon mineral spirits/7.2 lb VOC = 21,944 gallons mineral spirits/year ÷ 12 months/year = 1,828 gallons mineral spirits per month

326 IAC 8-1-6 (General Reduction Requirements)

- (a) The one (1) mineral spirits machining and washing operation (Unit 4) is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because it is subject to another provision of 326 IAC 8, specifically 326 IAC 8-3.

- (b) The one (1) machining operation (Unit 5) is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because the potential volatile organic compound (VOC) emissions from the mineral spirits and solvent usage are less than twenty-five (25) tons per year.
- (c) The one (1) Electronic Control Unit (ECU) assembly operation (Unit 6) is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because the potential volatile organic compound (VOC) emissions from the mineral spirits and solvent usage are less than twenty-five (25) tons per year.
- (d) The one (1) Electronic Control Unit (ECU) maintenance operation (Unit 7) is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because the potential volatile organic compound (VOC) emissions from the mineral spirits and solvent usage are less than twenty-five (25) tons per year.
- (e) The one (1) maintenance and production cleaning operation (Unit 8) is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because the potential volatile organic compound (VOC) emissions from the mineral sprits and solvent usage are less than twenty-five (25) tons per year.

326 IAC 8-3-2 (Cold Cleaner Operation)

The one (1) mineral spirits machining and cleaning operation and the degreasing operations (Insignificant Activity) are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operation) because it is a new facility which commenced operation after January 1, 1980. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the Permittee shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operating requirements;
- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The one (1) mineral spirits machining and cleaning operation and the degreasing operations (Insignificant Activity) are subject to the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) because it is a new facility which commenced operation after July 1, 1990. Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control),

- (a) The Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Solvent Emission Limitations) because all facilities were all constructed after January 1, 1980 which is the applicability date for Hancock County.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The mineral spirits storage tanks are not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this source is not located in any of the listed counties in this rule.

326 IAC 8 (Volatile Organic Compound Rules)

There are no 326 IAC 8 (Volatile Organic Compound Rules) that apply to the one (1) machining operation (Unit 5), the one (1) Electronic Control Unit assembly operation (Unit 6), the one (1) Electronic Control Unit maintenance operation (Unit 7) or the one (1) maintenance and production cleaning operation (Unit 8).

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) overspray from the eight (8) aluminum furnaces (Unit 1), three (3) core sand mixing machines, eight (8) core sand molding machines and four (4) core knockout machines (Unit 2), and the one (1) throttle body shotblast (Unit 3) be limited by the following:

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

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

For the eight (8) aluminum furnaces:

P = 2,312 pounds per hour = 1.156 tons per hour

E = 4.52 pounds PM per hour

The wet scrubber shall be in operation at all times the eight (8) aluminum furnaces are in operation to ensure compliance with this requirement.

For the three (3) core sand mixing machines, eight (8) core sand molding machines and four (4) core knockout machines:

P = 1,201 pounds per hour = 0.6005 tons per hour

E = 2.91 pounds PM per hour

The three (3) baghouses shall be in operation at all times the three (3) core sand mixing machines, eight (8) core sand molding machines and four (4) core knockout machines are in operation to ensure compliance with this requirement.

For the one (1) throttle body shotblast:

P = 353 pounds per hour = 0.1765 tons per hour

E = 1.28 pounds PM per hour

326 IAC 6-2-4 (Emission Limitations for facilities specified in 326 IAC 6-2-1(d))

The 6.0 million British thermal units per hour (mmBtu/hr) boiler (Insignificant Activity), constructed in 1988, is subject to the requirements of 326 IAC 6-2-4 (Emission Limitations for facilities specified in 326 IAC 6-2-1(d)) because it was constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4 (Emission Limitations for facilities specified in 326 IAC 6-2-1(d)), the

6.0 mmBtu/hr boiler shall be limited to 0.6 pounds per million British thermal unit. This limitation is used because the calculated limitation was greater than 0.6 pounds per million British thermal unit.

The calculated limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (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 operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

For the one (1) boiler:

$$Q = 6.0$$

$$Pt = 0.684 > 0.6$$

Therefore, the boiler is limited to 0.6 lb/mmBtu.

When using natural gas as fuel:

$$12 \text{ lb PM/MMCF} * \text{MMCF} / 1,000 \text{ mmBtu} = 0.012 \text{ lb PM/mmBtu}$$

Therefore, the boiler is in compliance with this requirement.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. 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.

The compliance monitoring requirements applicable to this source are as follows:

1. The eight (8) aluminum furnaces (Unit 1) have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the eight (8) aluminum furnaces stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) An inspection shall be performed each calendar quarter of the wet scrubber controlling the eight (8) aluminum furnaces.

These monitoring conditions are necessary because the wet scrubber for the eight (8) aluminum furnaces must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

2. The three (3) core sand mixing machines, eight (8) core sand molding machines and four (4) core knockout machines have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the three (3) core sand mixing machines, eight (8) core sand molding machines and four (4) core knockout machines stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the three (3) baghouses controlling the three (3) core sand mixing machines, eight (8) core sand molding machines and four (4) core knockout machines, at least once daily when the three (3) core sand mixing machines, eight (8) core sand molding machines and four (4) core knockout machines is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the three (3) baghouses shall be maintained within the

range of 4.0 to 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the three (3) baghouses for the three (3) core sand mixing machines, eight (8) core sand molding machines and four (4) core knockout machines must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

3. The one (1) mineral spirits machining and washing operation (Unit 4) has applicable compliance monitoring conditions as specified below:
 - (a) When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, or a temperature determined in the compliance tests to maintain a minimum overall 85% destruction of potential VOC emissions.

These monitoring conditions are necessary because the thermal oxidizer for the mineral spirits machining and washing operation must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

Conclusion

The operation of this automotive components manufacturing operation will be subject to the conditions of the attached proposed **FESOP No. F059-9160-00013**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: Indiana Precision Technology
Source Location: 400 West New Road, Greenfield, Indiana 46140
County: Hancock
SIC Code: 3714
Operation Permit No.: F059-9160-00013
Permit Reviewer: Cathie Moore

On January 29, 1998, the Office of Air Management (OAM) had a notice published in the Daily Reporter, Greenfield, Indiana, stating that Indiana Precision Technology had applied for a Federally Enforceable State Operating Permit (FESOP) to operate an automotive components manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 26, 1998, Dave Jordan of Environmental Resources Management representing Indiana Precision Technology submitted comments on the proposed FESOP. The summary of the comments is as follows (strikeout added to show what was deleted and bold added to show what was added):

Comment 1:

Condition A.2(1) - The furnace description should be modified to include reference to flux, as follows:

“... pounds of aluminum ingots **and flux** per hour, ...”

Response to Comment 1:

Condition A.2(1) “Emission Units and Pollution Control Equipment Summary” has been changed to be as follows:

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 2,312 pounds of aluminum ingots **and flux** per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);

The equipment listed in Section D.1 “FACILITY OPERATION CONDITIONS” has been changed to be as follows:

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 2,312 pounds of aluminum ingots **and flux** per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);

There are no changes to any conditions due to this comment.

Comment 2:

Condition A.2(2) - The foundry equipment described in this subpart is based, in part, on information contained in a March 14, 1996 submission to IDEM, which did not include some additional equipment which was included in a separate registration (CP059-5161, dated February 12, 1996). In addition, the equipment description appears to only include aluminum throughput from furnaces, and not sand from core sand molding machines (aluminum throughput capacity is 2.312 pounds per hour as described in A.2(1), and sand capacity is estimated to be 1,296 pounds per hour). IPT requests that the wording in this subpart be modified as follows:

"Eleven (11) shell core sand molding machines, eighteen (18) aluminum casting machines, one die maintenance area, and nine (9) core knockout machines, identified as Unit 2, with a maximum capacity of 3,068 pounds of aluminum and flux and sand per hour ..."

Response to Comment 2:

Condition A.2(2) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (2) ~~Three (3) core sand mixing machines, eight (8)~~ **Eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines, identified as Unit 2, with a maximum capacity of ~~1,204~~ **3,608** pounds of aluminum and ~~flux~~ **sand** per hour, using three (3) baghouses as control, exhausting to three (3) stacks (EF-49, EF-101, and EF-107);

The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (2) ~~Three (3) core sand mixing machines, eight (8)~~ **Eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines, identified as Unit 2, with a maximum capacity of ~~1,204~~ **3,608** pounds of aluminum and ~~flux~~ **sand** per hour, using three (3) baghouses as control, exhausting to three (3) stacks (EF-49, EF-101, and EF-107);

Condition D.1.1(b) "Particulate Matter" has been changed to be as follows:

- (b) The particulate matter (PM) ~~overspray emissions~~ from the ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines (Unit 2) shall be limited to ~~2.94~~ **6.08** pounds per hour, and

Condition D.1.3(b) "Particulate Matter" has been changed to be as follows:

- (b) The three (3) baghouses for PM control shall be in operation at all times when the ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines (Unit 2) are in operation.

Condition D.1.4(a) "Visible Emissions Notations" has been changed to be as follows:

- (a) Daily visible emission notations of the eight (8) aluminum furnaces, ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell** core sand molding machines, **eighteen**

(18) aluminum casting machines, one (1) die maintenance area and ~~four (4) nine (9)~~ core knockout machines and ~~one (1) throttle body shotblast~~ stack exhausts shall be performed **once per operating day** during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

Condition D.1.5 "Parametric Monitoring" has been changed to be as follows:

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the three (3) baghouses used in conjunction with the ~~three (3) core sand mixing machines, eight (8) eleven (11) shell~~ core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4) nine (9)~~ core knockout machines, at least once daily when the ~~three (3) core sand mixing machines, eight (8) eleven (11) shell~~ core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4) nine (9)~~ core knockout machines are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the three (3) baghouses shall be maintained within the range of ~~4.0~~ **2.0** and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

Condition D.1.8 (a) "Record Keeping Requirements" has been changed to be as follows:

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the eight (8) aluminum furnaces, ~~three (3) core sand mixing machines, eight (8) eleven (11) shell~~ core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4) nine (9)~~ core knockout machines and ~~one (1) throttle body shotblast~~ stack exhausts.

Comment 3:

Condition A.2(3) - The exhaust for the throttle body shotblast has been removed from the EF-49 baghouse exhaust, and simply exhausts back into the room. The exhaust still passes through a fabric filter at the shotblast prior to exhaust. IPT requests that this condition be modified as follows:

"... with maximum capacity of 353 pounds of aluminum per hour, which **exhausts inside the plant.**"

Response to Comment 3:

Condition A.2(3) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of ~~353~~ **10,000** pounds of ~~aluminum~~ **Zinc Shot** per ~~hour~~ **year**, ~~exhausting to one (1) stack (EF-49)~~ **which exhausts inside the plant;**

The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of ~~353~~ **10,000** pounds of ~~aluminum~~ **Zinc Shot** per ~~hour~~ **year**, ~~exhausting to one (1) stack (EF-49) which~~ **exhausts inside the plant;**

Condition D.1.4(a) "Visible Emissions Notations" has been changed to be as follows:

- (a) Daily visible emission notations of the eight (8) aluminum furnaces, ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell core sand molding machines, eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines ~~and one (1) throttle body shotblast~~ stack exhausts shall be performed **once per operating day** during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

Condition D.1.8 (a) "Record Keeping Requirements" has been changed to be as follows:

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the eight (8) aluminum furnaces, ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell core sand molding machines, eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines ~~and one (1) throttle body shotblast~~ stack exhausts.

Comment 4:

Condition A.2(4) - The equipment description indicates that Unit 4 is "One mineral spirits machining and washing operation, including four cold cleaner degreasers..." IPT believes that this description is confusion, since the emission unit includes over twenty-five machining washers and assembly and calibration washers which utilize mineral spirits. IPT also requests that reference to tanks in this condition be deleted and referenced in the list of Insignificant activities, since the storage tanks are not connected to the VOC control system. IPT suggests wording this description as follows:

"Machining washers and assembly and calibration washers and ~~three (3) mineral spirits storage tanks with capacities of 1,500 gallons, 1,500 gallons, and 3,000 gallons, identified as Unit 4, ..."~~

Response to Comment 4:

Condition A.2(4) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (4) ~~One (1) Mineral sprits machining and washing operations, including four cold cleaner degreasers and three (3) mineral spirits storage tanks with capacities of 1,500 gallons, 1,500 gallons and 3,000 gallons, identified as Unit 4, using one (1) Durr thermal oxidizer as control;~~

Condition A.3 "Insignificant Activities" has been changed to be as follows:

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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 6.0 million British thermal units per hour (mmBtu/hr) natural gas fired boiler;
- (2) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons

- per month;
- (3) VOC and HAP storage vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
 - (4) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
 - (5) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
 - (6) Machining where an aqueous cutting coolant continuously floods the machining interface;
 - (7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
 - (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
 - (9) Closed loop heating and cooling systems;
 - (10) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
 - (11) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
 - (12) Natural draft cooling towers not regulated under a NESHAP;
 - (13) Quenching operations used with heat treating processes;
 - (14) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
 - (15) Heat exchanger cleaning and repair;
 - (16) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
 - (17) Paved and unpaved roads and parking lots with public access;
 - (18) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
 - (19) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower;
 - (20) On-site fire and emergency response training approved by the department;
 - (21) Stationary fire pumps;
 - (22) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measure at 38 degrees C); and

- (23) A laboratory as defined in 326 IAC 2-7-1(20)(C);
- (24) T-6 Machines (2) (Casting Reheater & Quench Bath);
- (25) Impregnation (~~Cement Dipping~~);
- (26) Two (2) Chemical Shotblast (Die Repair);
- (27) Sand storage;
- (28) Water based coolants - mist collector;
- (29) Cutting Oils - mist collector;
- (30) Injector heat age;
- (31) Chromate system;
- (32) Injection Molding; ~~and~~
- (33) Shakeout (Foundry); ~~and~~
- (34) Three (3) mineral spirits storage tanks with capacities of 1,500 gallons, 1,500 gallons, and 3,000 gallons.**

The equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (4) ~~One (1) Mineral spirits machining and washing operations, including four cold cleaner degreasers and three (3) mineral spirits storage tanks with capacities of 1,500 gallons, 1,500 gallons and 3,000 gallons, identified as Unit 4, using one (1) Durr thermal oxidizer as control;~~

Also, the following equipment was added to the equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS":

(Insignificant Activity) Three (3) mineral spirits storage tanks with capacities of 1,500 gallons, 1,500 gallons, and 3,000 gallons.

Condition D.2.1 "Volatile Organic Compound" has been changed to be as follows:

D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP):

- (a)** The ~~one (1)~~ mineral spirits machining and washing operations shall be limited to ~~4,828~~ **13,387** gallons of mineral spirits usage per month.
- (b)** The Durr thermal oxidizer shall be in operation at all times the mineral spirits machining and washing operations are in operation. The thermal incinerator shall maintain a minimum operating temperature of 1,400°F, or a temperature determined in the compliance tests to maintain a minimum overall 85% destruction of potential VOC emissions.
- (c)** ~~This is~~ **These limitations are** equivalent to **potential to emit (PTE) volatile organic compounds (VOC) of seventy-nine (79) seventy-four and seven tenths (74.7) tons of volatile organic compounds (VOCs) per year.** This limitation will make 326 IAC 2-7 (Part

70) not applicable.

Condition D.2.2 "Volatile Organic Compound" has been changed to be as follows:

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the ~~one (1)~~ mineral spirits machining and washing operations (Unit ~~2~~ 4) and degreasing operations (Insignificant Activity) shall:

Condition D.2.3(a) "Volatile Organic Compound" has been changed to be as follows:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the ~~one (1)~~ mineral spirits machining and washing operations (Unit ~~2~~ 4) and degreasing operations (Insignificant Activity) shall ensure that the following control equipment requirements are met:

Condition D.2.7(a) "Volatile Organic Compound" has been changed to be as follows:

- (a) The ~~thermal oxidizer for VOC control shall be in operation at all times when the one (1)~~ mineral spirits machining and washing operations (Unit ~~2~~ 4) ~~are in operation and exhausting to the outside atmosphere~~ shall operate at an 85% overall control efficiency at all times.

Comment 5:

Condition A.2(5) - The equipment description indicates that Unit 5 is "One machining operation..." IPT believes that this description is confusing, since the emission unit includes several different machining units (exhausted to a single mist eliminator). IPT suggests wording this description as follows:

"Various machining units, identified as Unit 5, ..."

Response to Comment 5:

Condition A.2(5) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (5) ~~One (1) Machining operations~~, identified as Unit 5, using a mist collector as control, exhausting to one (1) stack (EF-44);

The equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (5) ~~One (1) Machining operations~~, identified as Unit 5, using a mist collector as control, exhausting to one (1) stack (EF-44);

Condition D.2.4 "Volatile Organic Compound" has been changed to be as follows:

D.2.4 Volatile Organic Compound (VOC)

Any change or modification to the machining operations (Unit 5), the ECU assembly operation (Unit 6), the ECU maintenance operation (Unit 7) and the maintenance and production operation (Unit 8) that would lead to an increase in volatile organic compound (VOC) emissions above

twenty-five (25) tons per year, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Comment 6:

Condition A.3(25) - IPT requests the phrase "Cement Dipping" be deleted from the description of this insignificant activity, as it does not accurately describe impregnation.

Response to Comment 6:

Condition A.3(25) "Insignificant Activities" has been changed to be as follows:

(25) Impregnation (~~Cement Dipping~~);

There are no changes to any conditions due to this comment.

Comment 7:

Condition C.6 - In Comment #16 below, IPT provides comments related to the Durr control unit which indicate that the equipment should be held to a standard established over a 365-day rolling period. IPT presumes that reference to operating control equipment *as described in Section D* indicates that, to the extent that language in Section D allows for compliance to be determined on an alternate basis (as opposed to instantaneous operation), that the Section D language would prevail over any general requirement of Section C. If not, IPT requests that the language of Condition C.6 be modified to require operation of the control equipment to the extent necessary to maintain compliance with the conditions of Section D. In addition, IPT presumes that if an "emergency" condition (as outlined in Condition B.14) occurred, that IPT would not automatically be presumed to be in violation so long as it complied with the requirements stated in Condition B.14.

Response to Comment 7:

Condition C.6 "Operation of Equipment" is a general operation condition for the entire source. This condition states that each facility listed in Section D shall be vented to the applicable control equipment and operated as required by the applicable Section D. Compliance with the conditions listed in Section D shall ensure compliance with this requirement. If an "emergency" condition occurred, the source shall comply with the requirements stated in Condition B.14 "Emergency Provisions". The "emergency" condition would be a deviation, but would not be a violation as long as the source complied with the requirements in Condition B.14 "Emergency Provisions". There will be no changes to these conditions in the final permit, due to this comment.

Comment 8:

Section D.1, equipment description, item 2 - see comment #1, 2, and 3 above.

Response to Comment 8:

The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 2,312 pounds of aluminum ingots **and flux** per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);

- (2) ~~Three (3) core sand mixing machines, eight (8)~~ **Eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines, identified as Unit 2, with a maximum capacity of ~~4,204~~ **3,608** pounds of aluminum and ~~flux~~ **sand** per hour, using three (3) baghouses as control, exhausting to three (3) stacks (EF-49, EF-101, and EF-107);
- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of ~~353~~ **10,000** pounds of ~~aluminum~~ **Zinc Shot** per ~~hour year~~, ~~exhausting to one (1) stack (EF-49) which exhausts inside the plant;~~

Comment 9:

Condition D.1.1(b), equipment description - see comment #2 above. In addition, the allowable limit computed in this condition should be modified to reflect the total production throughput, increasing allowable particulate matter emissions to 6.09 pounds per hour.

Response to Comment 9:

Condition D.1.1(b) "Particulate Matter" has been changed to be as follows:

- (b) The particulate matter (PM) ~~overspray emissions~~ from the ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines (Unit 2) shall be limited to ~~2.94~~ **6.08** pounds per hour, and

The allowable particulate matter (PM) emissions from the source are still less than one hundred (100) tons per year. Therefore, no other allowable particulate matter (PM) emissions limitations will be changed.

Comment 10:

Condition D.1.1(a), (b), and (c) - IPT suggests deleting the word "overspray" in each of these conditions, as particulate matter does not generally result from spraying activities in these operations.

Response to Comment 10:

Condition D.1.1(a), (b) and (c) "Particulate Matter" has been changed to be as follows:

- (a) The particulate matter (PM) ~~overspray emissions~~ from the eight (8) aluminum furnaces (Unit 1) shall be limited to 4.52 pounds per hour.
- (b) The particulate matter (PM) ~~overspray emissions~~ from the ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines (Unit 2) shall be limited to ~~2.94~~ **6.08** pounds per hour, and
- (c) The particulate matter (PM) ~~overspray emissions~~ from the one (1) throttle body shotblast (Unit 3) shall be limited to ~~1.28~~ pounds per hour as established in the following equation:

Comment 11:

Condition D.1.3(b), equipment description - see comment #2 above.

Response to Comment 11:

Condition D.1.3(b) "Particulate Matter" has been changed to be as follows:

- (b) The three (3) baghouses for PM control shall be in operation at all times when the ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines (Unit 2) are in operation.

Comment 12:

Condition D.1.4(a), equipment description - see comment #2 above. In addition, IPT requests that the language in this condition be clarified with the additional phrase as outlined below:

"... shall be performed **once per operating day** during normal daylight operations. ..."

Response to Comment 12:

Condition D.1.4(a) "Visible Emissions Notations" has been changed to be as follows:

- (a) Daily visible emission notations of the eight (8) aluminum furnaces, ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines and ~~one (1) throttle body shotblast~~ stack exhausts shall be performed **once per operating day** during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

Comment 13:

Condition D.1.5, equipment description - see comment #2 above. In addition, this condition established acceptable operating ranges for pressure drops for baghouse dust collectors. IPT has reviewed its operating data to determine if the stated pressure drop range of 4 to 7 inches of water accurately describe the normal operating ranges for this equipment. While these figures cover most conditions under which the baghouse operate, when new bags are placed in the dust collector, the pressure drop may drop to as low as 2 inches of water. As a result, IPT requests that the acceptable pressure drop be described as "... range of **2.0** to 7.0 inches of water. ..."

Response to Comment 13:

Condition D.1.5 "Parametric Monitoring" has been changed to be as follows:

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the three (3) baghouses used in conjunction with the ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines, at least once daily when the ~~three (3) core sand mixing machines, eight (8)~~ **eleven (11) shell** core sand molding machines, **eighteen (18) aluminum casting machines, one (1) die maintenance area** and ~~four (4)~~ **nine (9)** core knockout machines are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the three (3) baghouses shall be maintained within the range of ~~4-7~~ **2.0** and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated

at least once every six (6) months.

Comment 14:

Condition D.1.7 - IPT requests that the inspection schedule for the wet scrubber be extended to an inspection every six months. This will correlate to IPT's current inspection in accordance with its water discharge permit.

Response to Comment 14:

The Office of Air Management feels that if the wet scrubber were inspected only semiannually, the possibility for a malfunction of the control equipment would not be detected soon enough and would lead to a deviation from the permit requirements. Also, since there are no other methods other than scrubber inspections to show compliance, the frequency can not be relaxed. There will be no changes to this condition in the final permit due to this comment.

Comment 15:

Condition D.2, equipment description, item (4) and item (5) - see comments #4 and #5 above.

Response to Comment 15:

The equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (4) ~~One (1) Mineral spirits machining and washing operations, including four cold cleaner degreasers and three (3) mineral spirits storage tanks with capacities of 1,500 gallons, 1,500 gallons and 3,000 gallons, identified as Unit 4, using one (1) Durr thermal oxidizer as control;~~
- (5) ~~One (1) Machining operations, identified as Unit 5, using a mist collector as control, exhausting to one (1) stack (EF-44);~~

Also, the following equipment was added to the equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS":

(Insignificant Activity) Three (3) mineral spirits storage tanks with capacities of 1,500 gallons, 1,500 gallons, and 3,000 gallons.

Comment 16:

Condition D.2.1 - See comment #4 above regarding equipment description. In addition, IPT wishes to comment on the averaging period and the numeric limit on mineral spirits throughput used to determine compliance for this unit.

The original BACT determination for this unit did not specify the averaging period to be used in determining compliance with the requirement to reduce VOC emissions by 85%. As currently draft, the FESOP permit would require compliance on a continuous basis. IPT requests that this requirement be modified to allow compliance on a 365-day rolling average. This would recognize the fact that occasional fluctuations in collector removal efficiency may occur, while still assuring that annual emission limitations are met for the purpose of avoiding Title V.

IPT also believes that the limit on mineral spirit usage contained in this condition does not account for the fact that air pollution control equipment reduces the actual VOC emissions from this point by at least 85% (on a rolling 365-day basis). IPT believes that the allowable quantity of mineral spirits used each month should be limited as computed below:

$$79 \text{ t/yr VOC} * 2000 \text{ lb/t} * \text{yr}/12 \text{ mo} * (1/[1-0.85]) * (1 \text{ gal}/6.2 \text{ lb})$$

or 14,157 gallons of mineral spirits per month. IPT also believes that this figure should be computed after subtracting any waste solvent removed from the system each month. IPT notes that this computation uses a solvent density of 6.2 pounds per gallon. An earlier IPT application used an erroneous density of 7.2 pounds per gallon (which IDEM used in its Technical Support Document). Based upon these suggestions, IPT recommends that Condition D.2.1 be reworded as follows:

Pursuant to 326 IAC 2-8 (FESOP), the **Machining washers and assembly and calibration washers** shall be limited to **14,157** gallons of mineral spirits per month **based upon a 12-month rolling average, and accounting for any solvent disposed from these units shall reduce uncontrolled VOC emission by at least 85% as computed over a 365-day rolling average.**

This is equivalent to seventy-nine (79) tons of volatile organic compounds (VOCs) per year. This limitation will make 326 IAC 2-7 (Part 70) not applicable).

Response to Comment 16:

Condition D.2.1 "Volatile Organic Compound" has been changed to be as follows:

D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) The ~~one (1)~~ mineral spirits machining and washing operations shall be limited to ~~4,828~~ **13,387** gallons of mineral spirits usage per month.
- (b) **The Durr thermal oxidizer shall be in operation at all times the mineral spirits machining and washing operations are in operation. The thermal incinerator shall maintain a minimum operating temperature of 1,400°F, or a temperature determined in the compliance tests to maintain a minimum overall 85% destruction of potential VOC emissions.**
- (c) ~~This is~~ **These limitations are** equivalent to **potential to emit (PTE) volatile organic compounds (VOC) of seventy-nine (79) seventy-four and seven tenths (74.7) tons of volatile organic compounds (VOCs)** per year. This limitation will make 326 IAC 2-7 (Part 70) not applicable.

The Durr thermal oxidizer cannot have an averaging period to be used in determining compliance with the requirement to reduce VOC emissions by 85%. The requirement is to maintain a minimum overall 85% destruction efficiency. The oxidizer shall comply with this requirement at all times when the mineral spirits and machining and washing operations are in operation. The oxidizer may have a higher destruction efficiency, but may not have a lower destruction efficiency than 85%. Otherwise, this operation would not be in compliance with this requirement. Therefore, the condition will not be modified to allow compliance on a 365-day rolling average.

Comment 17:

Condition D.2.2 - See comment #4 above regarding equipment description. In addition, this unit should be referenced as Unit **4**.

Response to Comment 17:

Condition D.2.2 "Volatile Organic Compound" has been changed to be as follows:

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the ~~one (1)~~ mineral spirits machining and washing operations (Unit ~~2~~ 4) and degreasing operations (Insignificant Activity) shall:

Comment 18:

Condition D.2.3 - IPT requests that this condition be deleted from the FESOP permit for the Greenfield facility. IPT's operations are completely enclosed with exhaust to the Durr VOC control system, as required in the Best Available Control Technology (BACT) determination for this equipment. IPT believes that this control system provides greater control than would be achieved with the Reasonable Available Control Technology (RACT) standard condition as a general requirement in 326 IAC Article 8. Additionally, due to the equipment design for IPT's operations, it is impractical for IPT to meet many of the equipment requirements contained in this requirement (for example, there is no "cover" for this equipment, as units are enclosed and vented to the VOC control system).

Response to Comment 18:

326 IAC 8-1-6 (General Reduction Requirements) is applicable to the mineral spirits machining (calibration) operation. 326 IAC 8-3 is applicable to the mineral spirits washing operation. Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Operation Permit (OP 30-03-93-0069) issued March 13, 1989 the Durr thermal oxidizer shall be in operation at all times the mineral spirits machining (calibration) operation is in operation.

Since the mineral spirits washing operation is considered to be cold cleaning degreasing operations, 326 IAC 8-3-2 (Cold Cleaner Degreaser Operations) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) will be applicable. Therefore, these conditions cannot be deleted.

However, the following changes have been made to clarify the requirements.

Condition D.2.3(a) "Volatile Organic Compound" has been changed to be as follows:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the ~~one (1)~~ mineral spirits machining and washing operations (Unit ~~2~~ 4) and degreasing operations (Insignificant Activity) shall ensure that the following control equipment requirements are met:

Also, subsection (c) has been added to clarify the requirements as follows:

- (c) **The use of the Durr thermal oxidizer shall satisfy the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control).**

Condition D.2.7 "Volatile Organic Compound" has been changed to be as follows:

D.2.7 Volatile Organic Compound (VOC)

Pursuant to **326 IAC 8-1-6 (General Reduction Requirements)**, Operation Permit (OP 30-03-93-0069) issued on March 13, 1989 and Registration (CP 059-8152-00013) issued on February 28, 1997:

- (a) ~~The thermal oxidizer for VOC control shall be in operation at all times when the one (1) mineral spirits machining and washing operations (Unit 2 4) are in operation and exhausting to the outside atmosphere shall operate at an 85% overall control efficiency at all times.~~
- (b) When operating, the thermal incinerator shall maintain a minimum operating temperature

of ~~1,400°F~~ **1,350°F**, or a temperature determined in the compliance tests to maintain a minimum overall 85% destruction of potential VOC emissions.

Comment 19:

Condition D.2.6 - This condition notes that testing may be required to establish compliance with VOC limits in Conditions D.2.1, D.2.2, and D.2.3. IPT believes that Condition D.2.1 is the only Condition which establishes a limit on VOC emissions which could be measured, and requests that reference to Conditions D.2.2 and D.2.3 be deleted from this provision.

Response to Comment 19:

Condition D.2.6 "Testing Requirements" has been changed to be as follows:

D.2.6 Testing Requirements [326 IAC 2-8-5(1)]

~~Testing of this facility is not required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) limits specified in Conditions D.2.1, D.2.2, and D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f), 326 IAC 2-8-4 and 326 IAC 2-8-5. During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing for the Durr Thermal Oxidizer utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner to ensure a minimum destruction overall efficiency of 85 percent. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.~~

Comment 20:

Condition D.2.7 - IPT requests that Condition (a) be deleted, and that Condition (b) be reworded as follows:

~~"When operating, the thermal incinerator~~ **The Durr VOC control unit** shall maintain a minimum operating temperature of **1350°F**, or a temperature determined in the compliance test to maintain a minimum overall 85% destruction of potential VOC emissions **over a 365-day rolling period.**"

The Durr control unit has both a concentrator and a thermal destruction chamber. IPT believes that the unit will achieve a minimum of 85% removal of VOC with either the concentrator or oxidizer operating individually (although it would likely cost more to operate under these conditions). In addition, the compliance tests performed by IPT indicated that over 90% destruction occurred at a temperature of 1350°F, rather than 1400°F. Finally, IPT believes that so long as it maintains a destruction efficiency of 85% over a year (as averaged each day) this will satisfy the BACT requirement for this unit, and insure that IPT does not exceed the FESOP VOC limit.

Response to Comment 20:

Condition D.2.7(a) and (b) "Volatile Organic Compound" has been changed to be as follows:

- (a) ~~The thermal oxidizer for VOC control shall be in operation at all times when the one (1) mineral spirits machining and washing operations (Unit 2 4) are in operation and exhausting to the outside atmosphere shall operate at an 85% overall control efficiency at all times.~~
- (b) When operating, the thermal incinerator shall maintain a minimum operating temperature

of ~~1,400°F~~ **1,350°F**, or a temperature determined in the compliance tests to maintain a minimum overall 85% destruction of potential VOC emissions.

The thermal oxidizer must be in operation at all times the mineral spirits machining and washing operation is in operation to ensure compliance with 326 IAC 2-8 (FESOP). Therefore, Condition D.2.7(a) must remain in the final permit. The Durr thermal oxidizer cannot have an averaging period to be used in determining compliance with the requirement to reduce VOC emissions by 85%. The requirement is to maintain a minimum overall 85% destruction efficiency. The oxidizer shall comply with this requirement at all times when the mineral spirits and machining and washing operations are in operation. The oxidizer may have a higher destruction efficiency, but may not have a lower destruction efficiency than 85%. Otherwise, this operation would not be in compliance with this requirement. Therefore, the condition will not be modified to allow compliance on a 365-day rolling average.

Comment 21:

FESOP Quarterly Report (page 36 of 37) - This form should be revised consistent with comments above. Specifically, the allowable solvent usage should be changed to be 14,157 gallons per month over a 12-month rolling average.

Response to Comment 21:

The FESOP Quarterly Report has been modified to change the limit to **13,387** gallons per month and to require that the thermal oxidizer maintain a minimum overall 85% destruction efficiency.

Comment 22:

Technical Support Document - The Technical Support Document should be revised to include suggested equipment descriptions and other changes to permit language.

Response to Comment 22:

The Technical Support Document (TSD) should also reflect these changes in equipment descriptions as listed above. However, the TSD is not physically changed after Public Notice. The changes are noted here in the Addendum. There will be no changes to the final permit due to this comment.

Comment 23:

Technical Support Document - The emission summary for the plant (on page 6 of 13) estimates VOC emissions from insignificant activities as 1.0 tons per year. This value does not appear in the FESOP as a limitation in any manner, and for this reason, IPT assumes that its use in this table is for estimation purposes only. IPT believes that its insignificant activities may be higher than 1.0 tons per year, but assumes that so long as its overall plant emissions do not exceed 99.0 tons per year, that it is in compliance with the FESOP for the plant. If IPT's understanding of this matter is not correct, IPT would like to discuss the permit further to identify appropriate VOC emission limitations. The correct potential VOC emissions from all Insignificant Activities are 5.3 tons per year.

Response to Comment 23:

Condition D.2.1(a) and (c) "Volatile Organic Compound" has been changed to be as follows to reduce the allowable Volatile Organic Compound (VOC) emissions from this operation to be 74.7 tons per year:

- (a) The ~~one (1)~~ mineral spirits machining and washing operations shall be limited to ~~4,828~~

13,387 gallons of mineral spirits usage per month.

- (c) ~~This is~~ **These limitations are** equivalent to **potential to emit (PTE) volatile organic compounds (VOC) of seventy-nine (79) seventy-four and seven tenths (74.7) tons of volatile organic compounds (VOCs)** per year. This limitation will make 326 IAC 2-7 (Part 70) not applicable.

Upon further review, OAM has made the following changes to the final Part 70 permit:

1. Condition A.2(3) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

(3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of ~~353~~ **10,000** pounds of ~~aluminum~~ **Zinc Shot** per hour, ~~exhausting to one (1) stack (EF-49)~~ **which exhausts inside the plant;**

2. The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

(3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of ~~353~~ **10,000** pounds of ~~aluminum~~ **Zinc Shot** per hour, ~~exhausting to one (1) stack (EF-49)~~ **which exhausts inside the plant;**

3. Condition D.1.1(c) "Particulate Matter" has been changed to be as follows:

(c) The particulate matter (PM) ~~overspray emissions~~ from the one (1) throttle body shotblast (Unit 3) shall be limited to ~~1.28 pounds per hour as established in the following equation:~~

4. Condition D.1.2 "Testing Requirements" has been changed to be as follows:

D.1.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under ~~326 IAC 2-1-4(f),~~ 326 IAC 2-8-4 and 326 IAC 2-8-5.

5. Condition D.2.6 "Testing Requirements" has been changed to be as follows:

D.2.6 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) limits specified in Conditions D.2.1, D.2.2, and D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under ~~326 IAC 2-1-4(f),~~ 326 IAC 2-8-4 and 326 IAC 2-8-5. **During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing for the Durr Thermal Oxidizer utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner to ensure a minimum overall destruction efficiency of 85 percent. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.**

6. Condition D.3.2 "Testing Requirements" has been changed to be as follows:

D.3.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under ~~326 IAC 2-1-4(f)~~, 326 IAC 2-8-4 and 326 IAC 2-8-5.