

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Precision Press Industries
2400 East State Route 130
Hobart, Indiana 46342**

(herein known as the Permittee) is hereby authorized to construct the facilities listed in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-089-9330-00438	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This construction 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 2-7-4(c)]

Responsible Official: Glenn A. Mueller
Source Address: 2400 East State Route 130, Hobart, Indiana 46342
Mailing Address: 2400 East State Route 130, Hobart, Indiana 46342
SIC Code: 3542
County Location: Lake
County Status: Attainment for Pb
Nonattainment for Ozone, PM10, CO, and SO2

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]

The construction and operation of a stamping machine manufacturing plant with a maximum metal component production rate of 4,045 pounds per hour consisting of the following equipment:

- (a) twelve (12) natural gas-fired preheat torches, identified as PT-1 through PT-12, each with a maximum capacity of 0.75 million British thermal units (MMBtu) per hour, exhausting to the building;
- (b) twenty-seven (27) MIG welding stations, identified as MIG-1 through MIG-27, each with a maximum capacity of 4.0 pounds of wire per hour, exhausting to the building;
- (c) one (1) shotblasting operation, with a maximum capacity of 620 pounds of metallic abrasive per hour, with emissions controlled by one (1) baghouse system, exhausting to Vent BH1;
- (d) one (1) surface coating operation consisting of one (1) electrostatic gun and one (1) airless gun with a combined maximum application rate of 2.95 pounds of paint per hour, exhausting to the building;
- (e) two (2) natural gas-fired air curtain furnaces, identified as ACF-1 and ACF-2, each with a maximum heat input rate of 2.162 MMBtu per hour, exhausting to Vent ACF1 and ACF2, respectively;
- (f) one (1) natural gas-fired air curtain furnace, identified as ACF-3, with a maximum heat input rate of 0.819 MMBtu per hour, exhausting to Stack ACF3;
- (g) one (1) natural gas-fired Reznor/Storage forced air heater with a maximum heat input capacity of 0.20 MMBtu per hour, exhausting to Stack 4;
- (h) two (2) natural gas-fired forced air heaters, identified as Cambell/East and Cambell/West, each with a maximum heat input capacity of 2.0 MMBtu per hour, exhausting to Stack S1 and S2, respectively;

- (i) two (2) natural gas-fired forced air heaters, identified as Carrier-1 and Carrier-2, each with a maximum heat input capacity of 0.11 MMBtu per hour, exhausting to Stack 3;
- (j) two (2) natural gas-fired forced air heaters, identified as Store-1 and Store-2, each with a maximum heat input capacity of 0.075 MMBtu per hour, exhausting to Stack S5 and S6, respectively; and
- (k) one (1) natural gas-fired hot water heater, identified as WH-1, with a maximum heat input capacity of 0.156 MMBtu per hour, exhausting to Stack 3.

This existing source received a registration permit (CP-089-9012-00438) on October 24, 1997 for its stamping machine manufacturing plant. The source submitted an application on December 29, 1997 to modify the stamping machine process line to incorporate additional equipment. Based on the timetable at which these two projects were reviewed and submitted, the OAM requires the equipment from the approval and the equipment from this application be reviewed together for permitting purposes. Upon review of all equipment, it has been determined that a construction permit is required. This construction permit shall supersede the registration permit (CP-089-9012-00438) issued on October 24, 1997.

Section B Construction Conditions

B.1 General Construction Conditions

- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may result in an increase in allowable emissions, the change must be approved by IDEM, OAM.
- (b) This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- (c) Notwithstanding Construction Condition B.4, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).
- (d) When the facility is constructed and placed into operation, the operation conditions required by Section C shall be met.

B.2 Effective Date of the Permit

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance, unless a petition for a stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Permit Revocation

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

B.4 First Time Operation Permit

This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, IN 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM, OAM.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1 (Fees).
- (e) Pursuant to 326 IAC 2-1-4, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. The operation permit issued shall contain as a minimum the conditions in the Operation Conditions section of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

General Conditions:

C.1 General Operation Conditions

- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by IDEM, OAM.
- (b) The Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

C.2 Transfer of Permit

Pursuant to 326 IAC 2-1-6 (Transfer of Permits), the following requirements shall apply:

- (a) In the event that ownership of this stamping machine manufacturing plant is changed, the Permittee shall notify:

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

within thirty (30) days of the change. Notification shall include the date or proposed date of said change.

- (b) A written notification shall be sufficient to transfer the permit from the current owner to the new owner.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

C.3 Permit Revocation

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) violation of any condition of this permit;
- (b) failure to disclose all the relevant facts, or misrepresentation in obtaining this permit;
- (c) changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit;
- (d) noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode; or
- (e) for any cause which establishes in the judgment of IDEM, OAM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

C.4 Availability of Permit

Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by IDEM, OAM, or other public official having jurisdiction.

C.5 Malfunction Condition

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to IDEM, OAM or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (Pages 14 and 15 of this permit), or equivalent. Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.6 Permit Supersession

This permit, upon issuance, shall supersede registration permit (CP-089-9012-00438) issued on October 24, 1997.

Emission Limitations and Standards:

C.7 Opacity Limitations

Pursuant to 326 IAC 5-1-2(1) (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the opacity from the source shall meet the following:

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

C.8 Fugitive Dust Emission Limitations

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM, OAM pursuant to 326 IAC 6-4-5(c).

C.9 Particulate Matter (PM) Emission Limitations

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Matter Emission Limitations), PM emissions to the atmosphere from the combustion units, shotblasting process, welding process, and surface coating operations shall not exceed 0.03 grain/dry standard cubic foot.

C.10 Volatile Organic Emission Limitations

- (a) Pursuant to 326 IAC 8-2-9 (Volatile Organic Compound (VOC) Emission Limitations for Miscellaneous Metal Coating Operations), the VOC emissions from the surface coating operation shall not exceed 3.5 pounds per gallon of coating, excluding water.
- (b) The VOC emissions from the painting operations shall be limited to 24 tons per year, rolled on a monthly basis, to avoid the requirements of 326 IAC 2-3 (Emission Offset Rules).

Compliance Determination and Monitoring Requirements:

C.11 Visible Emission Determination

Pursuant to 326 IAC 5, opacity observations from the source shall be performed in accordance with the applicable procedures under 326 IAC 5-1-4 and 40 CFR 60, Appendix A, Method 9.

C.12 Compliance with Particulate Matter Emission Limitations

- (a) The shotblast baghouse shall be operated at all times when the process is in operation to demonstrate compliance with Condition C.9.
- (b) The particulate matter overspray from the surface coating operation shall be in compliance with the PM emission limitations contained in Condition C.9 provided that the overspray is not visibly detectable at the exhaust or accumulated on the rooftops or on the ground.

C.13 Baghouse Operation Condition

- (a) The Permittee shall take readings of the total static pressure drop across the baghouse of the shotblasting operation, at least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1 and 4 inches of water. The Preventive Maintenance Plan for these baghouses shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.
- (b) The instrument used for determining the pressure shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (c) The gauge employed to take the pressure drop across the baghouses or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
- (d) An inspection shall be performed each calendar quarter of the all the baghouses. Defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.
- (e) In the event that a bag's failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been replaced.
 - (2) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

C.14 Compliance with Volatile Organic Compound Emission Limitations

- (a) Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), the Permittee shall demonstrate compliance with the VOC limitation contained in Condition C.10(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (b) The Permittee shall demonstrate compliance with the VOC emission limitation contained in Condition C.10(b) by keeping monthly records of VOC usage.

Recordkeeping and Reporting Requirements:

C.15 Recordkeeping Requirements

- (a) The Permittee shall maintain monthly coating usage records to demonstrate compliance with Operation Condition C.10(b).
- (b) The Permittee shall maintain weekly logs of the parameters established in Operation Condition C.13(a), semi-annual logs of the parameters established in Operation Condition C.13(b) and quarterly logs of the parameters established in Operation Condition C.13(d) shall be maintained for a minimum of 36 months. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM representative.
- (e) 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.
- (f) 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; and
 - (4) records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.

C.16 Reporting Requirements

- (a) Pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee shall annually submit an emission statement of the source. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015.

The annual emission statement 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.

- (b) A VOC Quarterly Report of monthly VOC emissions to demonstrate compliance with the limitations required by Operation Conditions C.10(b) shall be submitted within thirty (30) days following each quarter.

**Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section**

VOC Quarterly Report

Company Name: Precision Press Industries
Location: 2400 East State Route 130, Hobart, Indiana 46342
Permit No.: 089-9330-00438
Source/Facility: Surface Coating Operations
Pollutant: VOC - Limit to avoid Emission Offset (326 IAC 2-3)
Limit: 24 tons VOC per year, rolled on a monthly basis

YEAR: _____

Month	VOC Emissions This Month (tons/month)	VOC Emissions Last 12 Month Period (tons/year)

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ?____, 100 LBS/HR VOC ?____, 100 LBS/HR SULFUR DIOXIDE ?____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ?____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/ 19____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL*SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

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

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO₂, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

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

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

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name:	Precision Press Industries
Source Location:	2400 East State Route 130, Hobart, Indiana 46342
County:	Lake
Construction Permit No.:	089-9330-00438
SIC Code:	3542
Permit Reviewer:	Michele M. Williams

The Office of Air Management (OAM) has reviewed an application from Precision Press Industries relating to the construction and operation of the following equipment to its existing stamping machine manufacturing plant with a maximum metal component production rate of 4,045 pounds per hour:

- (a) twelve (12) natural gas-fired preheat torches, identified as PT-1 through PT-12, each with a maximum capacity of 0.75 million British thermal units (MMBtu) per hour, exhausting to the building;
- (b) twenty-seven (27) MIG welding stations, identified as MIG-1 through MIG-27, each with a maximum capacity of 4.0 pounds of wire per hour, exhausting to the building;
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- (d) one (1) surface coating operation consisting of one (1) electrostatic gun and one (1) airless gun with a combined maximum application rate of 2.95 pounds of paint per hour, exhausting to the building;
- (e) two (2) natural gas-fired air curtain furnaces, identified as ACF-1 and ACF-2, each with a maximum heat input rate of 2.162 MMBtu per hour, exhausting to Vent ACF1 and ACF2, respectively;
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- (j) two (2) natural gas-fired forced air heaters, identified as Store-1 and Store-2, each with a maximum heat input capacity of 0.075 MMBtu per hour, exhausting to Stack S5 and S6, respectively; and
- (k) one (1) natural gas-fired hot water heater, identified as WH-1, with a maximum heat input capacity of 0.156 MMBtu per hour, exhausting to Stack 3.

This existing source received a registration permit (CP-089-9012-00438) on October 24, 1997 for its stamping machine manufacturing plant. The source submitted an application on December 29, 1997 to modify the stamping machine process line to incorporate additional equipment. Based on the timetable at which these two projects were reviewed and submitted, the OAM requires the equipment from the approval and the equipment from this application be reviewed together for permitting purposes. Upon review of all equipment, it has been determined that a construction permit is required. This construction permit shall supersede the registration permit (CP-089-9012-00438) issued on October 24, 1997.

This Precision Press Industries facility receive precut sections of steel and welds the basic formation of large stamping presses. The presses are primed and then shipped to another location for further processing. The stamping presses are manufactured for the automotive industry.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temp (°F)
ACF1	Air Curtain Furnace	30	Vent	unknown	300
ACF2	Air Curtain Furnace	30	Vent	unknown	300
ACF3	Air Curtain Furnace	30	1.0	unknown	300
S1	Cambell/East Heater	11	1.1	650	300
S2	Cambell/West Heater	11	1.1	650	300
S3	Carrier 1 & 2 Heater and Water Heater	29	0.75	120	300
S4	Reznor/Storage Heater	12	0.33	65	300
S5	Store-1 Heater	18	0.5	25	300
S6	Store-2 Heater	18	0.5	25	300
BH1	Baghouse to Shotblaster	30	Vent	12,600	70
E1	Roof Fan	50	4	unknown	70
E2	Wall Fan	10	2	unknown	70

Enforcement Issue

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

Recommendation

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

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

An application for the purposes of this review was received on December 29, 1997 with additional information received on September 24, 1998, September 29, 1998, October 21, 1998 and October 23, 1998.

Emissions Calculations

The detailed emission calculations are included in Appendix A.

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/yr)	Potential Emissions (ton/yr)
Particulate Matter (PM)	41.6	56.9
Sulfur Dioxide (SO ₂)		0.037
Volatile Organic Compounds (VOC)		24.3
Carbon Monoxide (CO)		1.30
Nitrogen Oxides (NO _x)		6.19
Single Hazardous Air Pollutant (HAP)		5.70
Combination of HAPs		5.70

- (a) Allowable PM emissions are determined from the applicability of rule 326 IAC 6-1. The allowable PM emissions based on the rules cited are less than the potential PM emissions, therefore, the allowable PM emissions are used for the permitting determination.
- (b) Allowable emissions (as defined in the Indiana Rule) of PM are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

- (a) VOC and NO_x pollutants 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. Lake County has been designated as a serious nonattainment area for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) The source is located in a portion of Lake County that has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	28.7
PM10	28.7
SO ₂	0.037
VOC	24.3
CO	1.30
NO _x	6.19
Single HAP	5.70
Combination HAPs	5.70

This new source is not a major stationary source because:

- (a) the stamping machine manufacturing plant is not in one of the 28 listed source categories and no attainment pollutant is emitted at a rate of 250 tons per year or greater. Therefore, the Prevention of Significant Deterioration Rules pursuant to 326 IAC 2-2 do not apply;
- (b) the source is located in a serious nonattainment area for ozone (volatile organic compounds (VOC) and oxides of nitrogen (NO_x)). The NO_x emissions do not exceed 25 tons per year, and the VOC emissions have been limited to 24 tons per year to avoid the Emission Offset requirements pursuant to 326 IAC 2-3; and
- (c) the hazardous air pollutant (HAP) emissions have been limited to less than 10 tons single HAP per year and less than 25 tons combined HAPs per year to avoid the requirements of 326 IAC 2-1-3.4.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

40 CFR 60 (NSPS) and 40 CFR 63 (NESHAP)

The existing stamping machine manufacturing plant is not subject to any New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP).

State Rule Applicability

326 IAC 2-3 (Construction Permit Conditions)

This rule applies to sources located in Lake County, designated as a serious nonattainment area, that have the potential to emit more than 25 tons per year. The VOC emissions from the surface coating operation at the source are 23.8 tons per year. Because of the flexibility inherent in surface coating operations, such as coating changes, the source will be required to keep records of VOC usage to ensure that this rule does not apply.

326 IAC 5-1 (Visible Emission Limitations)

This rule applies to visible emissions, not including condensed water vapor, emitted by or from a facility or source. This source is not located in the portion of Lake County defined by 326 IAC 5-1-1(c)(4), therefore the applicability requirements of 326 IAC 5-1-1(b) and 326 IAC 5-1-2(1) shall apply. Pursuant to 326 IAC 5-1-2(1), the visible emissions shall not exceed an average of 40 percent opacity in 24 consecutive readings and 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-1 (Particulate Limitations for Nonattainment Counties)

This rule applies to sources or facilities located in Lake County as defined in 326 IAC 6-1-1 and 326 IAC 6-1-7 which have the potential to emit 100 tons PM or more per year or have actual emissions of 10 tons PM or more per year. Based on the emission calculations provided in Appendix A, Precision Press Industries does not have the potential to emit 100 tons PM or more per year, but could have actual emissions of 10 tons PM or more per year. Therefore, pursuant to 326 IAC 6-1-2(a), this source shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot (dscf). Based on the baghouse information provided in the application, the shotblasting operation is in compliance with the PM limitation required by this rule.

326 IAC 8-2-9 (VOC Emission Limitations for Miscellaneous Metal Surface Coating Operations)

The surface coating operation is subject to the requirements of 326 IAC 8-2-9 because it coats metal parts or products in an industrial category with a Standard Industrial Classification (SIC) Code of 3542. Pursuant to 326 IAC 8-2-9(d)(2), the source shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds per gallon of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 90 degrees Celsius. Based on the surface coating calculations provided in Appendix A, the source is in compliance with this rule.

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) Construction Permit Application Form Y.

- (a) The surface coating operations will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act (CAA).
- (b) Detailed air toxic calculations from the electrostatic painting process are presented in Appendix A.

Conclusion

The construction of the proposed equipment to the existing stamping machine manufacturing plant will be subject to the conditions of the attached **Construction Permit No. CP-089-9330-00438**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Precision Press Industries
 Source Location: 2400 East State Route 130, Hobart, Indiana 46342
 County: Lake
 Construction Permit No.: CP-089-9330-00438
 SIC Code: 3542
 Permit Reviewer: Michele M. Williams

On November 12, 1998, the Office of Air Management (OAM) had a notice published in the *Gary Post Tribune* in Gary, Indiana stating that Precision Press Industries, had applied for a construction permit to construct and operate a stamping machine manufacturing plant with a maximum metal component production rate of 4,045 pounds per hour. The notice also stated that OAM proposed to issue a permit for this installation 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.

The opacity regulations under 326 IAC 5, have been revised and were finalized during the public comment period. Therefore, Operation Conditions C.7 and C.11 have been revised to reflect the new, updated language (boldface type represents additions to the original condition and strikethrough type represents deletions to the original condition):

C.7 Opacity Limitations

Pursuant to 326 IAC 5-1-2(1) (~~Visible Emission~~ **Opacity** Limitations) except as provided in 326 IAC 5-1-3 (Temporary ~~Exemptions~~ **Alternative Opacity Limitations**), the ~~visible emissions~~ **opacity** from the source shall meet the following:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of 40% ~~opacity~~ in ~~24 consecutive readings~~ **any one (1) six (6) minute averaging period.**
- (b) ~~Visible emissions~~ **Opacity** shall not exceed 60% ~~opacity~~ for more than a cumulative total of 15 minutes (60 readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a 6-hour period.

C.11 Visible Emission Determination

Pursuant to 326 IAC 5, ~~visible emissions~~ **opacity** observations from the source shall be performed in accordance with the applicable procedures under 326 IAC 5-1-4 and 40 CFR 60, Appendix A, Method 9.

Appendix A: Emissions Calculations

Company Name: Precision Press Industries
 Address City IN Zip: 2400 East State Rout 130, Hobart, Indiana 46342
 CP: 089-9330
 Plt ID: 089-00438
 Reviewer: Michele M. Williams
 Date: August 12, 1998

Emissions Summary

Emissions	PM/PM10		SO2		NOx		VOC		CO	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
Potential Uncontrolled Emissions	312	56.9	0.203	0.037	33.9	6.19	133	24.3	7.12	1.3
Potential Controlled Emissions (PTE)	157	28.7	0.203	0.037	33.9	6.19	133	24.3	7.12	1.3
Allowable Emissions	77.8	41.6								
Threshold Levels										
Registration Permit	25	25	50	25	25	25	15	25	125	25

A. Natural Gas Commercial Units (0.3 - < 10 MMBtu/hr)

Emission Factors, lb/MMCF:			PM/PM10: 11.9	SO2: 0.6	NOx: 100	VOC: 5.8	CO: 21					
			Potential Emissions									
Facility Description	Heat Input MMBtu/hr	Throughput MMCF/yr	PM/PM10		SO2		NOx		VOC		CO	
			lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Air Curtain Furnace, ACF-1	2.162	19	0.026	0.113	0.001	0.006	0.216	0.947	0.013	0.055	0.045	0.199
Air Curtain Furnace, ACF-2	2.162	19	0.026	0.113	0.001	0.006	0.216	0.947	0.013	0.055	0.045	0.199
Air Curtain Furnace, ACF-3	0.8	7	0.010	0.043	0.000	0.002	0.082	0.359	0.005	0.021	0.017	0.075
Twelve Preheat Torches, (0.75 MMBtu/hr each)	9.0	79	0.107	0.469	0.005	0.024	0.900	3.942	0.052	0.229	0.189	0.828
Cambell/East Heater	2.0	18	0.024	0.104	0.001	0.005	0.200	0.876	0.012	0.051	0.042	0.184
Cambell/West Heater	2.0	18	0.024	0.104	0.001	0.005	0.200	0.876	0.012	0.051	0.042	0.184
Totals:			0.216	0.946	0.011	0.048	1.814	7.947	0.105	0.461	0.381	1.669

Methodology: MMCF = 1,000,000 Cubic Feet of Gas
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors for PM/PM10, SO2, VOC, and CO are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-03-006-03
 Emission Factors for NOx are from actual measurements supplied by the burner manufacturer
 Emission Factors for NOx: 88.2 for cleaner heater, 74.6 for rinse water heater, and 63.0 for the cleaner dryer heater and chem treat dryer
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton