

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Metaldyne Sintered Components
3100 North State Highway #3
North Vernon, Indiana 47265**

(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 2-7 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.: T 079-12982-00014	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 17, 2002 Expiration Date: April 17, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary iron automotive connecting rods and steel forging source.

Responsible Official:	Tom Houck
Source Address:	3100 North State Highway #3, North Vernon, Indiana 47265
Mailing Address:	3100 North State Highway #3, North Vernon, Indiana 47265
General Source Phone Number:	812 - 346 - 1566
SIC Code:	3462
County Location:	Jennings
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Two (2) 600-amp electric delube furnaces, known as A1 and A2, each equipped with natural gas-fired afterburners, each rated at 0.002 million British thermal units per hour for methane control, exhausted through Stacks AS1 and AS2, installed in 1994, capacity 1,440 pounds of carbon steel rods per hour, each.
- (b) Three (3) 600-amp electric delube furnaces, known as A3, A5 and A6, each equipped with a natural gas-fired afterburner, each rated at 0.002 million British thermal units per hour for methane control, exhausted through Stacks AS3, AS5 and AS6, installed in 1994, capacity: 1,440 pounds of carbon steel rods per hour, each.
- (c) One (1) 900-amp electric delube furnace, known as A7, equipped with a natural gas-fired afterburner, rated at 0.002 million British thermal units per hour for methane control, exhausted through Stack AS7, installed in 1999, capacity: 2,880 pounds of carbon steel rods per hour.
- (d) One (1) 900-amp electric delube furnace, known as A8, equipped with a natural gas-fired afterburner, rated at 0.002 million British thermal units per hour for methane control exhausted through Stack AS8, to be installed, capacity: 2,880 pounds of carbon steel rods per hour.
- (e) Eight (8) 330-amp electric rotary hearth furnaces, known as B1 through B8, exhausted through Stacks BS1 through BS8, B1 through B4 installed in 1994, B5 and B6 installed in 1995, B7 and B8, installed in 1997, capacity: 1,050 pounds of carbon steel rods per hour, each for B1 through B7 and 2,100 pounds of carbon steel rods per hour for B8.

- (f) Six (6) 330-amp electric rotary hearth furnaces, known as B9 through B14, exhausted through Stacks BS9 through BS14, to be installed, capacity: 1,050 pounds of carbon steel rods per hour, each.
- (g) Two (2) 330-amp electric rotary hearth furnaces, known as B15 and B16, exhausted through Stacks BS15 and BS16, installed in 1999, capacity: 2,100 pounds of carbon steel rods per hour, each.
- (h) Four (4) secondary deflash machines, known as SD1, SD2, SD3 and SD9, each equipped with a dust collector, installed in 1999, capacity: 1,000 pounds of carbon steel rods per hour, each.
- (i) Five (5) secondary deflash machines, known as SD4, SD5, SD6, SD7 and SD8, each equipped with a dust collector, installed in 1995, capacity: 1,000 pounds of steel carbon rods per hour, each.
- (j) Two (2) shot peen machines, known as SP1 and SP2, equipped with two (2) baghouses, known as SPD1 and SPD2, respectively, installed in 1994, capacity: 144,000 pounds of steel shot per hour and a throughput of 2,000 pounds of carbon steel rods per hour, each.
- (k) Two (2) shot peen machines, known as SP3 and SP4, equipped with two (2) baghouses, known as SPD3 and SPD4, respectively, installed in 1995, capacity: 144,000 pounds of steel shot per hour and a throughput of 2,000 pounds of carbon steel rods per hour, each.
- (l) One (1) shot peen machine, known as SP5, equipped with one (1) baghouse, known as SPD5, installed in 1999, capacity: 144,000 pounds of steel shot per hour and a throughput of 4,800 pounds of carbon steel rods per hour.
- (m) Two (2) shot peen machines, known as SP6 and SP7, equipped with two (2) baghouses, known as SPD6 and SPD7, respectively, to be installed, capacity: 144,000 pounds of steel shot per hour, each, SP6 throughput: 2,000 pounds of carbon steel rods per hour, SP7 throughput: 4,800 pounds of carbon steel rods per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

- (a) Three (3) compacting presses, known as CP1 through CP3, installed in 1994, capacity: 2,880 pounds of powdered carbon steel per hour, each. (326 IAC 6-3-2)
- (b) Two (2) compacting presses, known as CP5 and CP6, installed in 1995, capacity 2,880 pounds of powdered carbon steel per hour, each. (326 IAC 6-3-2)
- (c) One (1) compacting press, known as CP7, installed in 1999, capacity: 2,880 pounds of powdered carbon steel per hour. (326 IAC 6-3-2)
- (d) One (1) compacting press, known as CP8, to be installed, capacity: 2,880 pounds of powdered carbon steel and lubricant per hour. (326 IAC 6-3-2)
- (e) Two (2) double disk grinders, known as DD1 and DD2, equipped with a wet process for PM control, installed in 1994, capacity: 2,000 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)

- (f) Two (2) double disk grinders, known as DD3 and DD4, equipped with a wet process for PM control, installed in 1995, capacity: 2,000 pounds of carbon steel rods per hour. (326 IAC 6-3-2)
- (g) Two (2) double disk grinders, known as DD5 and DD6, equipped with a wet process for PM control, to be installed, capacity: 2,000 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (h) Four (4) 900-ton forge presses, known as F1 through F4, installed in 1994, capacity of 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (i) Two (2) 900-ton forge presses, known as F5 and F6, installed in 1995, capacity: 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (j) One (1) 900-ton forge press, known as F7, installed in 1997, capacity: 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (k) One (1) 1,000-ton forge press, known as F8, installed in 1997, capacity: 2,100 pounds of carbon steel rods per hour. (326 IAC 6-3-2)
- (l) Six (6) 900-ton forge presses, known as F9 through F14, to be installed, capacity: 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (m) Two (2) 1,000-ton forge presses, known as F15 and F16, installed in 1999, capacity: 2,100 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (n) Five (5) magna flux machines, known as MF1, MF2, MF3, MF4 and MF5, installed in 1995, capacity: 2,300 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (o) One (1) magna flux machine, known as MF7, installed in 1999, capacity: 2,300 pounds of carbon steel rods per hour. (326 IAC 6-3-2)
- (p) Four (4) mazak machines, known as M1 through M4, installed in 1999, capacity: 800 pounds of carbon steel per hour each. (326 IAC 6-3-2)
- (q) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (326 IAC 8-3-5) (326 IAC 8-3-2) consisting of two (2) parts washers, installed in 1994.
- (r) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3-2)
- (s) Paved and unpaved roads and parking lots with public access. (326 IAC 6-4)
- (t) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations as well as a quality control Wheelabator shot blaster. (326 IAC 6-3-2)
- (u) Emergency generators as follows: diesel generators not exceeding 1,600 horsepower; natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

- (v) Farm operations.
- (w) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (x) Ink jet operations (14 stations) have the potential to emit MEK and methanol (HAPs) emissions at a total of 0.229 tons per year.
- (y) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (z) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (aa) Noncontact cooling tower systems with either of the following: forced and induced draft cooling tower system not regulated under a NESHAP.
- (bb) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (cc) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (dd) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (ee) One (1) automated deflash machine, known as AD10, equipped with a self-contained aerology unit (dust collector), known as ADA10, exhausting inside the building, installed in 1999, capacity: 1,200 pounds of carbon steel rods per hour.
- (ff) Thirty-six (36) rework sanders, known as G1 through G36, equipped with eleven (11) aerology units (dust collectors), installed in 1999, capacity: 500 pounds of carbon steel rods per hour, each.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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

B.3 Enforceability [326 IAC 2-7-7]

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

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

(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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification 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, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications 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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
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 2-7-5(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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) 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.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A 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:
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (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, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 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 Quality
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 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 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (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 2-7-20(a). 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 is not considered an application form, report or compliance certification. Therefore, the notification 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 2-7-20(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 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 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 any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor 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.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

The application 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) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.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]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- 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 2-7-6(6)]
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable 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. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission 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 often than once an 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.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop 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.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument 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) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual 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).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
 - (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
 - (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
 - (e) The Permittee shall record all instances when response steps are 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.
 - (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]
- (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 response actions. The Permittee shall submit a description of these

response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (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, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) 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. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports 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 for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (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 Quality
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, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) 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. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 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

Facility Description [326 IAC 2-7-5(15)]: Delube and Rotary Hearth Furnaces

- (a) Two (2) 600-amp electric delube furnaces, known as A1 and A2, each equipped with natural gas-fired afterburners, each rated at 0.002 million British thermal units per hour for methane control, exhausted through Stacks AS1 and AS2, installed in 1994, capacity 1,440 pounds of carbon steel rods per hour, each.
- (b) Three (3) 600-amp electric delube furnaces, known as A3, A5 and A6, each equipped with a natural gas-fired afterburner, each rated at 0.002 million British thermal units per hour for methane control, exhausted through Stacks AS3, AS5 and AS6, installed in 1994, capacity: 1,440 pounds of carbon steel rods per hour, each.
- (c) One (1) 900-amp electric delube furnace, known as A7, equipped with a natural gas-fired afterburner, rated at 0.002 million British thermal units per hour for methane control, exhausted through Stack AS7, installed in 1999, capacity: 2,880 pounds of carbon steel rods per hour.
- (d) One (1) 900-amp electric delube furnace, known as A8, equipped with a natural gas-fired afterburner, rated at 0.002 million British thermal units per hour for methane control exhausted through Stack AS8, to be installed, capacity: 2,880 pounds of carbon steel rods per hour.
- (e) Eight (8) 330-amp electric rotary hearth furnaces, known as B1 through B8, exhausted through Stacks BS1 through BS8, B1 through B4 installed in 1994, B5 and B6 installed in 1995, B7 and B8, installed in 1997, capacity: 1,050 pounds of carbon steel rods per hour, each for B1 through B7 and 2,100 pounds of carbon steel rods per hour for B8.
- (f) Six (6) 330-amp electric rotary hearth furnaces, known as B9 through B14, exhausted through Stacks BS9 through BS14, to be installed, capacity: 1,050 pounds of carbon steel rods per hour, each.
- (g) Two (2) 330-amp electric rotary hearth furnaces, known as B15 and B16, exhausted through Stacks BS15 and BS16, installed in 1999, capacity: 2,100 pounds of carbon steel rods per hour, each.

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

Construction Conditions For Emission Units A8 and B9 - B14

General Construction Conditions

D.1.1 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.

Effective Date of the Permit

D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate shall not exceed the following based on the process weight rates listed in the table.

The pounds per hour limitations were calculated with the following equation:

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

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

Operation	Process Weight Rate	Allowable PM Emission Rate (pounds per hour)
Delube Furnaces (A1, A2, A3, A5 & A6)	0.720 tons/hr each (1,440 lbs/hr each)	3.29 each
Delube Furnaces (A7 & A8)	1.44 tons/hr each (2,880 lbs/hr each)	5.24 each
Rotary Hearth Furnaces (B1 - B14)	0.525 tons/hr each (1,050 lbs/hr each)	2.66 each
Rotary Hearth Furnaces (B15 & B16)	1.05 tons/hr each (2,100 lbs/hr each)	4.24 each

- (b) The requirement from CP 079-3694-00014, issued October 25, 1994, Operation Condition 4 stated that pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed 2.91 pounds per hour is no longer applicable because with a process weight rate of 1,440 pounds per hour for the delube furnaces, known as A2, A3, A5, and A6, the allowable PM emission rate should be 3.29 pounds per hour, each. Thus, Operation Condition 4 of CP 079-3694-00014 is hereby rescinded.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days of permit issuance to verify the alternative emission factors of 1.5 pounds of CO per hour and 0.1382 pounds of NO_x per hour per delube furnace and of 0.31 pounds of CO per hour and 0.0016 pounds of NO_x per hour per rotary hearth furnace, a compliance stack test of CO and NO_x for one (1) of the delube furnaces (A7 or A8) and one (1) of the rotary hearth furnaces (B15 or B16) shall be performed. Testing shall be conducted in accordance with Section C- Performance Testing.

There are no specific Compliance Monitoring Requirements applicable to these emission units.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Deflash & Shot Peen Machines and Sanders

- (h) Four (4) secondary deflash machines, known as SD1, SD2, SD3 and SD9, each equipped with a dust collector, installed in 1999, capacity: 1,000 pounds of carbon steel rods per hour, each.
- (i) Five (5) secondary deflash machines, known as SD4, SD5, SD6, SD7 and SD8, each equipped with a dust collector, installed in 1995, capacity: 1,000 pounds of steel carbon rods per hour, each.
- (j) Two (2) shot peen machines, known as SP1 and SP2, equipped with two (2) baghouses, known as SPD1 and SPD2, respectively, installed in 1994, capacity: 144,000 pounds of steel shot per hour and a throughput of 2,000 pounds of carbon steel rods per hour, each.
- (k) Two (2) shot peen machines, known as SP3 and SP4, equipped with two (2) baghouses, known as SPD3 and SPD4, respectively, installed in 1995, capacity: 144,000 pounds of steel shot per hour and a throughput of 2,000 pounds of carbon steel rods per hour, each.
- (l) One (1) shot peen machine, known as SP5, equipped with one (1) baghouse, known as SPD5, installed in 1999, capacity: 144,000 pounds of steel shot per hour and a throughput of 4,800 pounds of carbon steel rods per hour.
- (m) Two (2) shot peen machines, known as SP6 and SP7, equipped with two (2) baghouses, known as SPD6 and SPD7, respectively, to be installed, capacity: 144,000 pounds of steel shot per hour, each, SP6 throughput: 2,000 pounds of carbon steel rods per hour, SP7 throughput: 4,800 pounds of carbon steel rods per hour.

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

Construction Conditions For Emission Units SP6 and SP7

General Construction Conditions

D.2.1 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.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate shall not exceed the following based on the process weight rates listed in the table.

The pounds per hour limitations were calculated with the following equation:

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

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

Operation	Process Weight Rate	Allowable PM Emission Rate (pounds per hour)
Secondary Deflash Machines (SD1 - SD9)	0.500 tons/hr each (1,000 lbs/hr each)	2.58 each
Shot Peens (SP1 - SP4, & SP6)	1.00 tons/hr each (2,000 lbs/hr each)	4.10 each
Shot Peens (SP5 & SP7)	2.40 tons/hr each (4,800 lbs/hr each)	7.37 each

- (b) The requirement from CP 079-4413-00014, issued May 16, 1995, Operation Condition 5 stated that pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed 20.3 pounds per hour for two (2) shot peens and 2.23 pounds per hour for five (5) deflash machines is no longer applicable because with a process weight rate of 2,000 pounds of carbon rods per hour, each for the two (2) shot peens, known as SP3 and SP4, the allowable PM emission rate should be 4.10 pounds per hour, each. And the five (5) secondary deflash machines, known as SD4, SD5, SD6, SD7 and SD8, with a process weight rate of 1,000 pounds of carbon rods per hour each, equates to an allowable PM emission rate 2.58 pounds per hour. Thus, Operation Condition 5 of CP 079-3694-00014 is hereby rescinded.
- (c) The requirement from CP 079-9498-00014, issued July 22, 1998, Condition D.1.1 stated that pursuant to 326 IAC 6-3-2, Pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed the listed truncated pounds per hour values for shot peen machines, SP1 - SP4, and deflash machines D4 - D8 is no longer applicable because the PM allowable emission rates are no longer truncated and are calculated with the proper process weight rates. Thus, Condition D.1.1 of CP 079-9498-00014, is hereby rescinded.
- (d) The requirement from CP 079-9994-00014, issued February 1, 1999, Condition D.1.1 stated that the allowable PM emission rate shall not exceed 48.0 pounds per hour each for shot peen machines, known as SP1 - SP5 is no longer applicable because with a process weight rate of 2,000 pounds of carbon rods per hour, each for the four (4) shot peens, known as SP1 - SP4, the allowable PM emission rate should be 4.10 pounds per hour, each. And shot peen machine, known as SP5 with a process weight rate of 4,800 pounds per hour equates to an allowable PM emission rate 7.37 pounds per hour. Thus, Condition D.1.1 of CP 079-9994-00014 is hereby rescinded.
- (e) The requirement from SSM 079-10884-00014, issued on August 10, 1999, Condition D.1.1 (c) stated that pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed 2.68 pounds per hour each of the two (2) shot peens, known as SP6 and SP7 is no longer applicable because with a process weight rate of 2,000 pounds of carbon rods per hour for SP6 and 4,800 pounds per hour for SP7 (both permitted, but never constructed) the allowable PM emission rates from the proposed emission units should be 4.10 and 7.37 pounds per hour, respectively. Thus, Condition D.1.1(c) of SSM 079-10884-00014 is hereby rescinded.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the deflash and shot peen machines and their control devices.

Compliance Determination Requirements

D.2.5 Particulate Matter (PM)

In order to comply with Condition D.2.3, the dust collectors and baghouses for PM control shall be in operation and control emissions from the secondary deflash machines (SD1 - SD9) and the shot peen machines (SP1 - SP7) at all times that these facilities are in operation.

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) To demonstrate compliance with Condition D.2.3, a compliance stack test of PM for any two (2) of the secondary deflash machines (SD1 - SD9) shall be performed between May 6, 2004 and November 6, 2004 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within 180 days of start-up, in order to demonstrate compliance with Condition D.2.3, the Permittee shall perform PM testing of the shot peen machine, known as SP7, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Visible Emissions Notations

- (a) Visible emission notations of the secondary deflash machines as well as the shot peen machines stack exhausts shall be performed during normal daylight operations once per shift when exhausting to the atmosphere. 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. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (f) The requirement from CP 079-9994-00014, issued February 1, 1999, Condition D.1.5 stated that daily visible emission notations from building vents and openings shall be performed once weekly during normal daylight operations. is no longer applicable because visible emission notations from stacks shall be performed once per shift during normal daylight

operations when exhausting to the atmosphere and will be emission unit specific. Thus, Condition D.1.5 of CP 079-9994-00014 is hereby rescinded.

D.2.8 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouses (SPD 1 - SPD7) used in conjunction with the shot peen machines (SP1 - SP7), at least once per shift when the shot peens are in operation when venting to the atmosphere. When for any one (1) reading, the pressure drop across the baghouses is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the shot peen machines when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations once per shift of the secondary deflash machines and the shot peen machines stack exhausts.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain the following:

- (1) Records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere once per shift.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (a) Three (3) compacting presses, known as CP1 through CP3, installed in 1994, capacity: 2,880 pounds of powdered carbon steel per hour, each. (326 IAC 6-3-2)
- (b) Two (2) compacting presses, known as CP5 and CP6, installed in 1995, capacity 2,880 pounds of powdered carbon steel per hour, each. (326 IAC 6-3-2)
- (c) One (1) compacting press, known as CP7, installed in 1999, capacity: 2,880 pounds of powdered carbon steel per hour. (326 IAC 6-3-2)
- (d) One (1) compacting press, known as CP8, to be installed, capacity: 2,880 pounds of powdered carbon steel and lubricant per hour. (326 IAC 6-3-2)
- (e) Two (2) double disk grinders, known as DD1 and DD2, equipped with a wet process for PM control, installed in 1994, capacity: 2,000 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (f) Two (2) double disk grinders, known as DD3 and DD4, equipped with a wet process for PM control, installed in 1995, capacity: 2,000 pounds of carbon steel rods per hour. (326 IAC 6-3-2)
- (g) Two (2) double disk grinders, known as DD5 and DD6, equipped with a wet process for PM control, to be installed, capacity: 2,000 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (h) Four (4) 900-ton forge presses, known as F1 through F4, installed in 1994, capacity of 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (i) Two (2) 900-ton forge presses, known as F5 and F6, installed in 1995, capacity: 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (j) One (1) 900-ton forge press, known as F7, installed in 1997, capacity: 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (k) One (1) 1,000-ton forge press, known as F8, installed in 1997, capacity: 2,100 pounds of carbon steel rods per hour. (326 IAC 6-3-2)
- (l) Six (6) 900-ton forge presses, known as F9 through F14, to be installed, capacity: 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (m) Two (2) 1,000-ton forge presses, known as F15 and F16, installed in 1999, capacity: 2,100 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (n) Five (5) magna flux machines, known as MF1, MF2, MF3, MF4 and MF5, installed in 1995, capacity: 2,300 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (o) One (1) magna flux machine, known as MF7, installed in 1999, capacity: 2,300 pounds of carbon steel rods per hour. (326 IAC 6-3-2)
- (p) Four (4) mazak machines, known as M1 through M4, installed in 1999, capacity: 800 pounds of carbon steel per hour each. (326 IAC 6-3-2)
- (q) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (326 IAC 8-3-5) (326 IAC 8-3-2) consisting of two (2) parts washers, installed in 1994.
- (r) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3-2)

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities - Continued

- (s) Paved and unpaved roads and parking lots with public access. (326 IAC 6-4)
- (t) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations as well as a quality control Wheelabrator shot blaster. (326 IAC 6-3-2)
- (u) Emergency generators as follows: diesel generators not exceeding 1,600 horsepower; natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (v) Farm operations.
- (w) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (x) Ink jet operations (14 stations) have the potential to emit MEK and methanol (HAPs) emissions at a total of 0.229 tons per year.
- (y) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (z) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (aa) Noncontact cooling tower systems with either of the following: forced and induced draft cooling tower system not regulated under a NESHAP.
- (bb) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (cc) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (dd) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (ee) One (1) automated deflash machine, known as AD10, equipped with a self-contained aerocology unit (dust collector), known as ADA10, exhausting inside the building, installed in 1999, capacity: 1,200 pounds of carbon steel rods per hour.
- (ff) Thirty-six (36) rework sanders, known as G1 through G36, equipped with eleven (11) aerocology units (dust collectors), installed in 1999, capacity: 500 pounds of carbon steel rods per hour, each.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator 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.3.2 Volatile Organic Compounds (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 a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following 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 (38EC) (one hundred degrees Fahrenheit (100EF));
 - (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 (38EC) (one hundred degrees Fahrenheit (100EF)), 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 (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (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 of 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 construction of which commenced after July 1, 1990, 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.

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations shall not exceed allowable PM emission rate based on the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the compacting presses, known as CP1 through CP8, double disk grinders, known as DD1 through DD6, forge presses, known as F1 through F16, magna flux machines, known as MF1 through MF5 and MF7, mazak machines, known as M1 through M4, automated deflash machine known as AD10 and the rework sanders known as G1 through G36 shall not exceed the following based on the process weight rates listed in the table.

The pounds per hour limitations were calculated with the following equation:

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

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

Operation	Process Weight Rate	Allowable PM Emission Rate (pounds per hour)
Compacting Presses (CP1 - CP8)	1.44 tons/hr each (2,880 lbs/hr)	5.24 each
Double Disk Grinders (DD1 - DD6)	1.00 tons/hr each (2,000 lbs/hr)	4.10 each

Operation	Process Weight Rate	Allowable PM Emission Rate (pounds per hour)
Forge Presses (F1 - F7 and F9 - F14)	0.525 tons/hr each (1,050 lbs/hr)	2.66 each
Forge Presses (F8, F15 and F16)	1.05 tons/hr each (2,100 lbs/hr)	4.24 each
Magna Flux Machines, (MF1 - MF5 and MF7)	1.15 tons/hr each (2,300 lbs/hr)	4.50 each
Mazak Machines (M1 - M4)	0.400 tons/hr each (800 lbs/hr)	2.22 each
Automated Deflash Machine (AD10)	0.600tons/hr (1,200 lbs/hr)	2.91
Rework Sanders (G1 - G36)	0.250 tons/hr each (500 lbs/hr each)	1.62 each

- (c) The requirement from SSM 079-10884-00014, issued on August 10, 1999, Condition D.1.1 (a) stated that pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed 4.35 pounds per hour for automated deflash machine, known as AD10 is no longer applicable because with a process weight rate of 1,200 pounds per hour for the automated deflash machine, known as AD10, the allowable PM emission rate should be 2.91 pounds per hour. Thus, Condition D.1.1(a) of SSM 079-10884-00014 is hereby rescinded.

D.3.4 Fugitive Dust Emissions (326 IAC 6-4)

Pursuant to 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 from paved and unpaved roads and parking lots with public access.

Compliance Determination Requirements

D.3.5 Particulate Matter (PM)

In order to comply with Condition D.3.3, the dust collectors and self-contained aerocology dust collectors for PM control shall be in operation and control emissions from the automated (AD10) deflash machine as well as the rework sanders at all times that these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Visible Emissions Notations

The requirement from SSM 079-10884-00014, issued on August 10, 1999, Condition D.1.4 which required daily visible emission notations of the rework sanders is no longer applicable because the rework sanders have been designated as insignificant activities. Thus, Condition D.1.4 of SSM 079-10884-00014 is hereby rescinded.

There are no specific Compliance Monitoring Requirements applicable to these emission units.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Metaldyne Sintered Components
Source Address: 3100 North State Highway #3, North Vernon, Indiana 47265
Mailing Address: 3100 North State Highway #3, North Vernon, Indiana 47265
Part 70 Permit No.: T 079-12982-00014

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 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (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:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Metaldyne Sintered Components
Source Address: 3100 North State Highway #3, North Vernon, Indiana 47265
Mailing Address: 3100 North State Highway #3, North Vernon, Indiana 47265
Part 70 Permit No.: T 079-12982-00014

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C** The 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.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Metaldyne Sintered Components
 Source Address: 3100 North State Highway #3, North Vernon, Indiana 47265
 Mailing Address: 3100 North State Highway #3, North Vernon, Indiana 47265
 Part 70 Permit No.: T 079-12982-00014

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

<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Metaldyne Sintered Components
Source Location: 3100 North State Highway #3, North Vernon, Indiana 47265
County: Jennings
SIC Code: 3462
Operation Permit No.: T 079-12982-00014
Permit Reviewer: Frank P. Castelli

On December 18, 2001, the Office of Air Quality (OAQ) had a notice published in the Plain Dealer and Sun, North Vernon, Indiana, stating that Metaldyne Sintered Components had applied for a Part 70 Operating Permit to operate an iron automotive connecting rods and steel forging source. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating 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 Part 70 Operating Permit should be issued as proposed.

On January 14, 2002, Kathryn M. Basham and Charles J. Staehler, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

In Section A.3(p), please revise all four (4) mazak machines to have a maximum capacity of 800 pounds of carbon steel per hour each. Please make this correction in the facility description in Section D.3, Section D.3.3(b) and in the Technical Support Document (TSD).

Response 1:

The insignificant activity in Condition A.3 and Section D.3 has been revised to reflect the fact that each of the four (4) mazak machines should have the same 800 pound per hour capacity. This Technical Support Document (TSD) addendum serves as a revision of the original TSD which is not reissued. In addition, the process weight rate and the allowable PM emission rate for all four (4) mazak machines in Condition D.3.3(b) have been revised as follows:

- (p) Four (4) mazak machines, **known as M1 through M4**, installed in 1999, capacity: 800 pounds of carbon steel per hour each for M1 and M2, ~~400 pounds of carbon steel per hour each for M3 and M4~~. (326 IAC 6-3-2)

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the compacting presses, known as CP1 through CP8, double disk grinders, known as DD1 through DD6, forge presses, known as F1 through F16, magna flux machines, known as MF1 through MF5 and MF7, mazak machines, known as M1 - **through** M4, automated deflash machine known as AD10 and the rework sanders known as G1 through G36 shall not exceed the following based on the process weight rates listed in the table.

The pounds per hour limitations were calculated with the following equation:

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

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

Operation	Process Weight Rate	Allowable PM Emission Rate (pounds per hour)
Compacting Presses (CP1 - CP8)	1.44 tons/hr each (2,880 lbs/hr)	5.24 each
Double Disk Grinders (DD1 - DD6)	1.00 tons/hr each (2,000 lbs/hr)	4.10 each
Forge Presses (F1 - F7 and F9 - F14)	0.525 tons/hr each (1,050 lbs/hr)	2.66 each
Forge Presses (F8, F15 and F16)	1.05 tons/hr each (2,100 lbs/hr)	4.24 each
Magna Flux Machines, (MF1 - MF5 and MF7)	1.15 tons/hr each (2,300 lbs/hr)	4.50 each
Mazak Machines (M1 & M2 - M4)	0.400 tons/hr each (800 lbs/hr)	2.22 each
Mazak Machines (M3 & M4)	0.200 tons/hr each (400 lbs/hr)	1.40 each
Automated Deflash Machine (AD10)	0.600 tons/hr (1,200 lbs/hr)	2.91
Rework Sanders (G1 - G36)	0.250 tons/hr each (500 lbs/hr each)	1.62 each

This change in the process weight rates for two (2) of the mazak machines, M3 and M4, does not represent a quantifiable increase in PM and/or PM₁₀ emissions, as these machines have negligible emissions.

Comment 2:

In Section A.3(q), please revise the installation date of the two (2) parts washers as installed in 1994. Please make this correction in the facility description in Section D.3 and in the Technical Support Document (TSD).

Response 2:

The installation date has been revised to 1994. The fact that the parts washers were considered proposed equipment does not affect any of the applicable rules. The purpose of this TSD Addendum is to document all changes that are necessary in the proposed permit and to update any factual information that was included in the Technical Support Document (TSD). The TSD is not revised and reissued. Therefore Conditions A.3(q) and D.3(q) have been revised as follows:

- (q) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (326 IAC 8-3-5) (326 IAC 8-3-2) consisting of two (2) parts washers, ~~to be~~ installed in 1994.

Comment 3:

In Section B.22(e), please revise this sentence to read as follows:

Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. The IDEM representative will obtain the consent of Metaldyne Sintered Component's plant manager prior to taking any photographs.

Metaldyne has assured all of their customers that no photographic documentation of the product and/or process will be taken. Metaldyne is aware that the IDEM has the authority to perform impromptu inspections of the source. Metaldyne is only requesting that photographs not be taken by the IDEM inspector without the proper authorization from Metaldyne's plant manager. If this revision is not made or a compromise obtained, Metaldyne MUST APPEAL the Title V permit. Metaldyne is willing to compromise on revising the language. Metaldyne is requesting the IDEM contact us immediately in order to work through a compromise prior to the Title V permit being issued.

Response 3:

IDEM staff contacted Metaldyne Sintered Components to discuss this issue. The introductory paragraph of Condition B.22 allows the source to specifically assert that the information about to be collected by the agency, including photographs (item (e)), should be considered confidential and be entitled to be treated as such. Metaldyne Sintered Components can review the pictures taken before the inspector leaves the site. If Metaldyne Sintered Components determines that the pictures contain sensitive material, they can make a claim of confidentiality and the pictures will be treated as confidential material by IDEM. On April 15, 2002 Metaldyne Sintered Components staff agreed that this was an acceptable approach. Therefore, no changes are required to the proposed permit.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

Comment 4:

Section C contains two C.16 headings. Please revise the second C.16 to read as C.17.

Response 4:

The second Condition C.16 has been re-numbered as C.17 as follows:

C.4617 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

The Table of Contents was correct.

Comment 5:

Please change the name of the Responsible Official to Tom Houck from Dennis Park.

Response 5:

As requested the "Responsible Official" has been changed to Tom Houck in Condition A.1 as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary iron automotive connecting rods and steel forging source.

Responsible Official: ~~Dennis Park~~ **Tom Houck**

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

The following updates have been made to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and became effective on January 19, 2002. For more information about this rulemaking, refer to the October 2001 Air Pollution Control Board Packet which can be found on the Internet at <http://www.state.in.us/idem/air/rules/apcb/packets/index.html>. The rule revisions were published in the February 1, 2002 Indiana Register which can be found on the Internet at <http://www.IN.gov/legislative/register/index-25.html>.

Change 1:

Condition B.2 has had the rule cite 326 IAC 2-1.1-9.5 added to include the new promulgated rule which clarifies when permits expire and when conditions in previous issued permits are superseded as follows:

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

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

Change 2:

Condition B.12 Emergency Provisions (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology-based emission limitations only. The condition is changed as follows:

B.12 Emergency Provisions [326 IAC 2-7-16]

- (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 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based~~ or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed,

contemporaneous operating logs or other relevant evidence that describe the following:

- (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 materials of substantial economic value.~~

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

Change 3:

Condition B.14 Multiple Exceedances has been deleted because 326 IAC 2-7-5(1)(E) has been repealed since it conflicted with 40 CFR 70.6(a)(6) as follows:

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

Change 4:

Condition B.14 Prior Permits Superseded was added to the proposed permit to implement the intent of the new rule 326 IAC 2-1.1-9.5 as follows:

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) **All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**
- (1) **incorporated as originally stated,**
- (2) **revised, or**
- (3) **deleted**
- by this permit.**
- (b) **All previous registrations and permits are superseded by this permit.**

Change 5:

Paragraph (b) of Condition B.13 Permit Shield has been deleted because this paragraph is no longer necessary due to the addition of the new Condition B.14 Prior Permits Superseded as follows:

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

Change 6:

In paragraph (c)(2) of Condition C.17, now renamed Compliance Response Plan - Preparation, Implementation, Records, and Reports, "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or record keeping requirements may now be approved as minor permit modifications. References to this condition throughout the proposed permit have been revised to reflect the name change of this condition as follows:

C.17 Compliance Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and 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~~ **a minor permit modification** to the permit, and such request has not been denied.

Change 7:

As required by IDEM OAQ stack testing guidance, effective January 1, 1999, when there are six (6) to twelve (12) identical emission units, two (2) of the emission units should be tested. Therefore Condition D.2.6 has been revised as follows:

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) To demonstrate compliance with Condition D.2.3, a compliance stack test of PM for ~~one (1)~~ **any two (2)** of the secondary deflash machines (SD1 - SD9) shall be performed between May 6, 2004 and November 6, 2004 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

On January 31, 2002, Kathryn M. Basham and Charles J. Staehler on behalf of Metaldyne Sintered Components submitted additional comments on the proposed Change 7 which required an additional stack test of a 2nd secondary deflash machine to the Part 70 Operating Permit. The comments are as follows:

Comment 1:

It is August Mack understanding that the IDEM is requesting two of the secondary deflash machines to be tested because the IDEM feels there is evidence warranting it. For the purposes of the IDEM Compliance Data Section to re-evaluate this request, August Mack is providing the description of the secondary deflash machines taken straight from Metaldyne Sintered Components' Title V application:

The secondary deflash machine removes a thin leaf of surface from the connecting rod., i.e., these units "peel" off a thin layer of metallic surface. Each secondary deflash machine is also equipped with an open type dust collector to collect insignificant amounts of PM and PM₁₀ emissions generated from the deflash process. The secondary deflash dust collectors exhaust inside the source. The emissions from the secondary deflash process are classified as insignificant.

Each machine has a potential to generate 1.74 pounds of PM per hour and 1.74 pounds of PM₁₀ per hour before controls. After controls, each machine has a potential to emit 0.017 pounds PM per hour and 0.017 pounds of PM₁₀ per hour. According the definition of insignificant activities, any emission unit that has the potential to emit before controls of less than 5.0 pounds per hour is considered and insignificant activity. Therefore, each secondary deflash machine should be considered an insignificant activity. Metaldyne Sintered Components has accepted the IDEM's request to stack test one of these nine secondary deflash machines but does not feel that the IDEM has warranted or provided evidence that two secondary deflash machines need to be stack tested in order to determine compliance with the source's Title V permit. Stack testing one of the machines should be sufficient. In addition, the IDEM has already required one compliance stack test on a secondary deflash machine performed in May of 1999.

This stack test could be used as the comparison test to also determine compliance with the source's Title V permit. Each PM and PM₁₀ stack test requested by the IDEM will cost the source approximately \$10,000 to complete. This is an extremely large amount of money for the source to endure. Please remove the additional stack testing requirements for the secondary deflash machines since the emission from the units are classified as insignificant. Metaldyne is already conducting one stack test to demonstrate compliance. The costs associated with the additional test are high and the threats to human health and the environment are small if the collector fails since the deflash machines exhaust indoors and the metal removed from the deflash machines is large diameter sized particulate.

Response 1:

The nine (9) secondary deflash machines all perform the same operation and as such IDEM considers the nine (9) facilities as a significant emission unit. The potential to emit before and after controls from each individual machine would qualify as an insignificant activity because the PM and PM₁₀ emissions are less than five (5) pounds per hour. However, since IDEM has grouped all of these machine as a significant emission unit, the potential to emit PM and PM₁₀ for the nine (9) machines is 68.7 tons per year and 0.687 tons per year after control based on the May 1999 PM stack test results. The source's calculations assumed that all PM equals PM₁₀.

Since there are nine (9) identical secondary deflash machines, IDEM's stack test guidance specifies that at least two (2) of the nine (9) machines are tested. The guidance goal was to test approximately twenty (20%) percent of the units to relieve the financial burden of stack testing each unit.

The May 1999 stack test was required by CP 079-9994-00014, issued February 1, 1999 because the IDEM wanted to assure that the entire source was a minor source pursuant to 326 IAC 2-2. Furthermore, Condition D.1.1 of this permit limited PM emissions to less than two hundred and fifty (250) tons per year. The requirement to test the secondary deflash machines, as well as the requirement to test shot peen SP7, in the proposed Part 70 permit in Condition D.2.6, will assure that the source is a minor source pursuant to 326 IAC 2-2 in addition to showing compliance with 326 IAC 6-3-2. The total potential PM emission from the shot peens and the secondary deflash machines is 510.2 tons per year; comprised of 441.5 tons per year for the shot peens (SP1 - SP7) and 68.7 tons per year for the secondary deflash machines (SD1 - SD9).

Note that Condition D.2.6 requires that the stack testing of the secondary deflash machines is not required until five (5) years after the 1999 stack test, or between May 6 and November 6, 2004.

Also note that although the Technical Support Document required stack testing for the proposed automated deflash machine (AD10), since it was required in SSM 079-10884 and was never done, stack testing was not included in the proposed Part 70 Operating Permit because there is only one (1) automated deflash machine at the source and it meets the definition of an insignificant activity.

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

Therefore, stack testing of two (2) of the nine (9) secondary deflash machines will be required.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for New Source Construction and a Part 70 Operating Permit

Source Background and Description

Source Name: Metaldyne Sintered Components
Source Location: 3100 North State Highway #3, North Vernon, Indiana 47265
County: Jennings
SIC Code: 3462
Operation Permit No.: T 079-12982-00014
Permit Reviewer: Frank P. Castelli

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Metaldyne Sintered Components relating to the operation of an iron automotive connecting rods and steel forging source.

This source is not a sintering plant as documented in the TSD Addendum for Construction Permit No. 079-9994, issued on February 1, 1999. Therefore the source is not one of the 28 major PSD source categories. The plant performs hot forging activities and not sintering operations at the defined sintering temperature of 2,050 degrees Fahrenheit.

Note that the source has requested to construct and operate proposed emission units and insignificant activities, some of which were originally permitted pursuant to SSM 079-10884-00014, issued on August 10, 1999, but were never constructed. All proposed facilities are being reviewed pursuant to 326 IAC 2-7-5(16) and 326 IAC 2-7-12.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) 600-amp electric delube furnaces, known as A1 and A2, each equipped with natural gas-fired afterburners, each rated at 0.002 million British thermal units per hour for methane control, exhausted through Stacks AS1 and AS2, installed in 1994, capacity 1,440 pounds of carbon steel rods per hour, each.
- (b) Three (3) 600-amp electric delube furnaces, known as A3, A5 and A6, each equipped with a natural gas-fired afterburner, each rated at 0.002 million British thermal units per hour for methane control, exhausted through Stacks AS3, AS5 and AS6, installed in 1994, capacity: 1,440 pounds of carbon steel rods per hour, each.
- (c) One (1) 900-amp electric delube furnace, known as A7, equipped with a natural gas-fired afterburner, rated at 0.002 million British thermal units per hour for methane control, exhausted through Stack AS7, installed in 1999, capacity: 2,880 pounds of carbon steel rods per hour.

- (d) Eight (8) 330-amp electric rotary hearth furnaces, known as B1 through B8, exhausted through Stacks BS1 through BS8, B1 through B4 installed in 1994, B5 and B6 installed in 1995, B7 and B8, installed in 1997, capacity: 1,050 pounds of carbon steel rods per hour, each for B1 through B7 and 2,100 pounds of carbon steel rods per hour for B8.
- (e) Two (2) 330-amp electric rotary hearth furnaces, known as B15 and B16, exhausted through Stacks BS15 and BS16, installed in 1999, capacity: 2,100 pounds of carbon steel rods per hour, each.
- (f) Four (4) secondary deflash machines, known as SD1, SD2, SD3 and SD9, each equipped with a dust collector, installed in 1999, capacity: 1,000 pounds of carbon steel rods per hour, each.
- (g) Five (5) secondary deflash machines, known as SD4, SD5, SD6, SD7 and SD8, each equipped with a dust collector, installed in 1995, capacity: 1,000 pounds of steel carbon rods per hour, each.
- (h) Two (2) shot peen machines, known as SP1 and SP2, equipped with two (2) baghouses, known as SPD1 and SPD2, respectively, installed in 1994, capacity: 144,000 pounds of steel shot per hour and a throughput of 2,000 pounds of carbon steel rods per hour, each.
- (i) Two (2) shot peen machines, known as SP3 and SP4, equipped with two (2) baghouses, known as SPD3 and SPD4, respectively, installed in 1995, capacity: 144,000 pounds of steel shot per hour and a throughput of 2,000 pounds of carbon steel rods per hour, each.
- (j) One (1) shot peen machine, known as SP5, equipped with one (1) baghouse, known as SPD5, installed in 1999, capacity: 144,000 pounds of steel shot per hour and a throughput of 4,800 pounds of carbon steel rods per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16) and 326 IAC 2-7-12:

- (k) One (1) 900-amp electric delube furnace, known as A8, equipped with a natural gas-fired afterburner, rated at 0.002 million British thermal units per hour for methane control exhausted through Stack AS8, to be installed, capacity: 2,880 pounds of carbon steel rods per hour.
- (l) Six (6) 330-amp electric rotary hearth furnaces, known as B9 through B14, exhausted through Stacks BS9 through BS14, to be installed, capacity: 1,050 pounds of carbon steel rods per hour, each. Note the five (5) 330-amp electric rotary hearth furnaces, known as B10 through B14, were originally permitted pursuant to SSM 079-10884-00014, issued on August 10, 1999, but were never constructed.
- (m) Two (2) shot peen machines, known as SP6 and SP7, equipped with two (2) baghouses, known as SPD6 and SPD7, respectively, to be installed, capacity: 144,000 pounds of steel shot per hour, each, SP6 throughput: 2,000 pounds of carbon steel rods per hour, SP7

throughput: 4,800 pounds of carbon steel rods per hour. Note these emission units were originally permitted pursuant to SSM 079-10884-00014, issued on August 10, 1999, but were never constructed with the throughput capacities of 2,118.17 pounds of carbon steel rods per hour total.

Removed Emission Units and Pollution Control Equipment

The following equipment has been removed from the source:

- (a) One (1) 400-amp electric delube furnace, known as A2A, equipped with a natural gas-fired afterburner, rated at 0.002 million British thermal units per hour for methane control, exhausted through Stack AS2A, installed in 1994, capacity: 1,440 pounds of carbon steel rods per hour.
- (b) Two (2) 90-amp electric normalizing furnaces, known as N1 and N2, installed 1994
- (c) One (1) 90-amp electric normalizing furnace, known as N3.
- (d) Five (5) 90-amp normalizing furnaces, known as N4, N5, N6, N7 and N8.
- (e) Five (5) primary deflash machines, known as PD4, PD5, PD6, PD7 and PD8, each with a maximum capacity of 477.50 pounds per hour and one (1) secondary deflash machine, known as SD9, equipped with a dust collector, known as PDD9, with a maximum capacity of 1,000 pounds per hour.

Permitted Emission Units and Pollution Control Equipment, But Never Constructed

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to SSM 079-10884-00014, issued on August 10, 1999. However, the source never constructed this equipment nor is the source proposing to construct or operate this equipment.

- (a) Three (3) 200-amp electric delube furnaces, known as A9 through A11, exhausted through Stacks AS9 through AS11, capacity: 2,183 pounds of powdered carbon steel per hour, total.
- (b) Compacting press, known as CP4.
- (c) Five (5) automated deflash machines, known as AD11 through AD15, each equipped with a self-contained aerocology unit (dust collector), known as ADA11 through ADA15, exhausting through general plant ventilation, capacity: 2,183 pounds of carbon steel rods per hour, each.

Insignificant Activities

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

- (a) Three (3) compacting presses, known as CP1 through CP3, installed in 1994, capacity: 2,880 pounds of powdered carbon steel per hour, each. (326 IAC 6-3-2)
- (b) Two (2) compacting presses, known as CP5 and CP6, installed in 1995, capacity 2,880 pounds of powdered carbon steel per hour, each. (326 IAC 6-3-2)

- (c) One (1) compacting press, known as CP7, installed in 1999, capacity: 2,880 pounds of powdered carbon steel per hour. (326 IAC 6-3-2)
- (d) One (1) compacting press, known as CP8, to be installed, capacity: 2,880 pounds of powdered carbon steel and lubricant per hour. (326 IAC 6-3-2)
- (e) Two (2) double disk grinders, known as DD1 and DD2, equipped with a wet process for PM control, installed in 1994, capacity: 2,000 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (f) Two (2) double disk grinders, known as DD3 and DD4, equipped with a wet process for PM control, installed in 1995, capacity: 2,000 pounds of carbon steel rods per hour. (326 IAC 6-3-2)
- (g) Two (2) double disk grinders, known as DD5 and DD6, equipped with a wet process for PM control, to be installed, capacity: 2,000 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (h) Four (4) 900-ton forge presses, known as F1 through F4, installed in 1994, capacity of 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (i) Two (2) 900-ton forge presses, known as F5 and F6, installed in 1995, capacity: 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (j) One (1) 900-ton forge press, known as F7, installed in 1997, capacity: 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (k) One (1) 1,000-ton forge press, known as F8, installed in 1997, capacity: 2,100 pounds of carbon steel rods per hour. (326 IAC 6-3-2)
- (l) Six (6) 900-ton forge presses, known as F9 through F14, to be installed, capacity: 1,050 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2).
- (m) Two (2) 1,000-ton forge presses, known as F15 and F16, installed in 1999, capacity: 2,100 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)
- (n) Five (5) magna flux machines, known as MF1, MF2, MF3, MF4 and MF5, installed in 1995, capacity: 2,300 pounds of carbon steel rods per hour, each. (326 IAC 6-3-2)

There is no magna flux machine, known as MF6.

- (o) One (1) magna flux machine, known as MF7, installed in 1999, capacity: 2,300 pounds of carbon steel rods per hour. (326 IAC 6-3-2)
- (p) Four (4) mazak machines, known as M1 through M4, installed in 1999, capacity: 800 pounds of carbon steel per hour each for M1 and M2, 400 pounds of carbon steel per hour each for M3 and M4. (326 IAC 6-3-2)
- (q) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 consisting of two (2) parts washers, to be installed. (326 IAC 8-3-5) (326 IAC 8-3-2).

- (r) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3-2)
- (s) Paved and unpaved roads and parking lots with public access. (326 IAC 6-4)
- (t) Emergency generators as follows: diesel generators not exceeding 1,600 horsepower; natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (u) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations as well as a quality control Wheelabrator shot blaster (326 IAC 6-3-2)
- (v) Farm operations.
- (w) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (x) Ink jet operations (14 stations) have the potential to emit MEK and methanol (HAPs) emissions at a total of 0.229 tons per year.
- (y) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (z) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (aa) Noncontact cooling tower systems with either of the following: forced and induced draft cooling tower system not regulated under a NESHAP.
- (bb) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (cc) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (dd) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (ee) One (1) automated deflash machine, known as AD10, equipped with a self-contained aerocology unit (dust collector), known as ADA10, exhausting inside the building, installed in 1999, capacity: 1,200 pounds of carbon steel rods per hour.
- (ff) Thirty-six (36) rework sanders, known as G1 through G36, equipped with eleven (11) aerocology units (dust collectors), installed in 1999, capacity: 500 pounds of carbon steel rods per hour, each.

Existing Approvals

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

- (a) CP 079-3694-00014, issued October 25, 1994;
- (b) CP 079-4413-00014, issued May 16, 1995;
- (c) CP 079-9498-00014, issued July 22, 1998;
- (d) CP 079-9994-00014, issued February 1, 1999; and
- (e) SSM 079-10884-00014, issued on August 10, 1999.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP 079-3694-00014, issued October 25, 1994

Operation Condition 4: Pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed 2.91 pounds per hour.

Reason not incorporated: With a process weight rate of 1,440 pounds per hour for the delube furnaces, known as A2, A3, A5, and A6, the allowable PM emission rate should be 3.29 pounds per hour, each. Therefore, the allowable PM emissions for each unit are revised to reflect the correct process weight rate.

- (b) CP 079-4413-00014, issued May 16, 1995

Operation Condition 5: Pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed 20.3 pounds per hour for two (2) shot peens and 2.23 pounds per hour for five (5) deflash machines.

Reason not incorporated: With a process weight rate of 2,000 pounds of carbon rods per hour, each for the two (2) shot peens, known as SP3 and SP4, the allowable PM emission rate should be 4.10 pounds per hour, each. And five (5) secondary deflash machines, known as SD4, SD5, SD6, SD7 and SD8, with a process weight rate of 1,000 pounds of carbon rods per hour each, equates to an allowable PM emission rate 2.58 pounds per hour, each. Therefore, the allowable PM emissions for each unit are revised to reflect the correct process weight rate.

- (c) CP 079-9498-00014, issued July 22, 1998

Condition D.1.1: Pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed the listed truncated pounds per hour values for shot peen machines, SP1 - SP4, and deflash machines D4 - D8.

Reason not incorporated: The PM allowable emission rates are no longer truncated and are calculated with the proper process weight rates.

- (d) CP 079-9994-00014, issued February 1, 1999
- (1) Condition D.1.1: Pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed 48.0 pounds per hour each for shot peen machines, known as SP1 - SP5.
- Reason not incorporated: With a process weight rate of 2,000 pounds of carbon rods per hour, each for the four (4) shot peens, known as SP1 - SP4, the allowable PM emission rate should be 4.10 pounds per hour, each. And shot peen machine, known as SP5 with a process weight rate of 4,800 pounds per hour equates to an allowable PM emission rate 7.37 pounds per hour. Therefore, the allowable PM emissions for each unit is revised to reflect the correct process weight rate.
- (2) Condition D.1.5: Daily visible emission notations from building vents and openings shall be performed once weekly during normal daylight operations.
- Reason not incorporated: Visible emission notations from stacks shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and will be emission unit specific. Therefore, this condition is added for the operation.
- (e) SSM 079-10884-00014, issued on August 10, 1999.
- (1) Condition D.1.1(a): Pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed 4.35 pounds per hour for automated deflash machine, known as AD10.
- Reason not incorporated: With a process weight rate of 1,200 pounds per hour for the proposed automated deflash machine, known as AD10, the allowable PM emission rate will be 2.91 pounds per hour.
- (2) Condition D.1.1(c): Pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall not exceed 2.68 pounds per hour each of the two (2) shot peens, known as SP6 and SP7.
- Reason not incorporated: With a process weight rate of 2,000 pounds of carbon rods per hour for SP6 and 4,800 pounds per hour for SP7 (both permitted, but never installed) the allowable PM emission rates from the proposed emission units will be 4.10 and 7.37 pounds per hour, respectively.
- (3) Condition D.1.4: Required daily visible emission notations of the rework sanders.
- Reason not incorporated: Since the allowable PM emission rate is less than ten (10) pounds of PM per hour with control device, compliance monitoring is not required.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification to consider the afterburners as integral parts of the new and old delube furnaces:

If the afterburners are not operating, the pilot flame of the delube furnace will shut off automatically. As a result, the delube furnace will not operate. Therefore, the afterburners are an integral part of the delube furnace operation. As a result, the potential methane emis-

sions before and after the afterburner will be the same.

Furthermore, the company stated:

According to the revised rules presented in 40 CFR 51.100(s)(1), methane emissions are no longer considered VOC emissions. Therefore, the only VOC emissions generated from the delube process is from the combustion of natural gas. These VOC emissions generated from the combustion of natural gas are insignificant. The afterburners are not utilized to control any criteria or hazardous air pollutants.

IDEM, OAQ has evaluated the justification and determined that the afterburners will not be considered as integral parts of the delube furnaces. A reconfiguration of the pilot flame control would make it possible to operate the delube furnaces without the afterburners. Therefore, the afterburners are not considered integral parts of the delube furnaces.

In addition, since the methane emissions being controlled by the afterburners are not VOC emissions, potential emissions of VOC are not affected by this determination. Therefore, the permitting level will be determined using the potential to emit before the afterburners. Also since methane emissions controlled by the afterburners, a reconstruction of the pilot flame would not be considered a modification pursuant to 326 IAC 1-2-42 because the potential to emit a regulated pollutant is not effected.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 Part 70 permit application for the purposes of this review was received on November 15, 2000. Additional information was received on February 20, April 11, June 18, and November 27, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for summary of the emissions calculations below and insignificant activities on page 3 of 3 as well as the natural gas combustion on pages 1 and 2 of 3. Detailed emission calculations for the shot peen, secondary and automated deflash machines, delube and rotary furnaces and rework sanders are provided below:

(a) Shot Peen Machines

Since an official stack test for PM₁₀ emissions has not been performed to substantiate twenty-five (25%) percent of PM is PM₁₀, the potential PM and PM₁₀ emissions before and after controls for these units have been calculated utilizing the worst-case scenario assuming that all PM is PM₁₀. The IDEM approved shot peen machine stack test was performed

on May 5 and 6, 1999.

(1) Potential Emissions for Shot Peen Machines (SP1 - SP7) Before Controls

PM Emission Factor = (PM Emission Factor after controls from stack test)/(1 - efficiency of collector)

PM Emission Factor = (0.001 lbs/ton)/(1 - 0.995) = 0.2 lbs/ton

PM = (Maximum Throughput)(PM Emission Factor)(8,760 hrs/yr)(1 ton/2,000 lbs)(7 machines)

PM = (144,000 lbs/hr)(1 ton/2,000 lbs)(0.2 lbs/ton)(8,760 hrs/yr)(1 ton/2,000 lbs)(7 machines)

PM = 441.50 tons/yr total

(2) Potential Emissions for Shot Peen Machines (SP1 - SP7) After Controls

PM = (Maximum Throughput)(PM Emission Factor)(8,760 hrs/yr)(1 ton/2,000 lbs)(7 machines)

PM = (144,000 lbs/hr)(1 ton/2,000 lbs)(0.001 lbs/ton)(8,760 hrs/yr)(1 ton/2,000 lbs)(7 machines)

PM = 2.21 tons/yr total

and PM = PM₁₀

(b) Secondary Deflash Machines

The IDEM approved secondary deflash machine stack test was performed on May 5 and 6, 1999.

(1) Potential Emissions for Secondary Deflash Machines (SD1 - SD9) Before Controls

PM Emission Factor = (PM Emission Factor after controls from stack test)/(1 - efficiency of collector)

PM Emission Factor = (0.0428 lbs/ton)/(1 - 0.99) = 4.28 lbs/ton

PM = (Maximum Throughput)(PM Emission Factor)(8,760 hrs/yr)(1 ton/2,000 lbs)(9 machines)

PM = (814 lbs/hr)(1 ton/2,000 lbs)(4.28 lbs/ton)(8,760 hrs/yr)(1 ton/2,000 lbs)(9 machines)

PM = 68.67 tons/yr total

(2) Potential Emissions for Secondary Deflash Machines (SD1 - SD9) After Controls

PM = (Maximum Throughput)(PM Emission Factor)(8,760 hrs/yr)(1 ton/2,000 lbs)(9 machines)

PM = (814 lbs/hr)(1 ton/2,000 lbs)(0.0428 lbs/ton)(8,760 hrs/yr)(1 ton/2,000 lbs)(9 machines)

PM = 0.687 tons/year total

and PM = PM₁₀

(c) Introduction to Delube and Rotary Furnace Emissions

The stack tests conducted on March 14, 2000 by Metaldyne for the rotary hearth and delube furnaces were submitted to the IDEM, OAQ. To date, Metaldyne has not received a response to the submitted information. IDEM Compliance Branch has indicated that IDEM never received the stack test results.

Since there are no standard emission factors for the rotary hearth and delube furnaces, Metaldyne voluntarily stack tested the furnaces in order to accurately calculate the potential carbon monoxide and nitrogen oxide emissions generated from the processes.

The following information has been provided by William Heidt, Special Projects Manager at Metaldyne, to further explain why there are no methane emissions from these furnaces.

The potential source of methane emission is from the decomposition of the Acrawax lubricant. The lubricant is part of a mixture which promotes uniform pre-compaction flow, reduces inter-granular friction during compaction, and lubricates tooling. At temperature of 140 degrees Fahrenheit, the Acrawax will begin to vaporize in the form of methane. The delube process is designed to remove the lubricant, reduce oxides, and pre-sinter the compacted preform for improved strength.

A continuous belt furnace conveys the preform through a convective zone, a pre-heat zone, a high-heat zone and a cooling section. The furnace uses a reducing protective atmosphere consisting of nitrogen and hydrogen. Temperature in both the pre-heat and high-heat zones is substantially higher than 1,400 degrees Fahrenheit. Since the temperature in the convective zone is lower than 1,400 degrees Fahrenheit, a supervised natural gas flame is maintained through the belt for the full width of the entrance, thereby ensuring that the escaping gases have a continuous source of ignition. The methane vapor generated in the convective zone mixes with the protective atmosphere and ambient air and is exposed to the flame to sustain complete combustion of the vapor. Therefore, the methane emissions are non-existent.

In addition, the flame purges oxygen from the openings in the preforms as they pass through it just before entering the furnace. Pure nitrogen is used as a rear curtain gas at the discharge end of the furnace. Therefore, the gas which does escape is pure nitrogen. In addition, decomposition of Acrawax will result in carbon monoxide emissions. Due to generation of nitrogen and carbon monoxide emissions from the delube process, Metaldyne performed a stack test to verify the quantity of nitrogen oxide and carbon monoxide emissions.

(d) Delube Furnaces

A maximum of 720 pieces per hour can be processed through each delube furnace. Each delube furnace has a maximum capacity of 736 grams per piece, except for furnaces A7 and the proposed A8 which has a maximum capacity of 1,676 grams per piece. Based on vendor data, the Acrawax that has been added will, at 1,700 degrees Fahrenheit in a nitrogen/hydrogen protective atmosphere, be hydrogenated and release methane, ammonium and water. The methane is controlled by the afterburners and after control emissions (in addition to the insignificant natural gas combustion emissions) include NO_x and CO.

A single in-house stack test was conducted on March 14, 2000, and the emission factors from this test have been used to estimate the potential NO_x and CO emissions from these furnaces. OAQ will require stack testing to validate these emission factors.

- (1) Potential Process Emissions for Delube Furnaces (A1, A2, A3, A5, A6, A7 and proposed A8)

Using the in-house stack test data for NO_x and CO results in the following:

NO_x = 0.1382 lbs/hr * 8,760 hrs/yr * 2,000 lbs/ton = 0.605 tons/yr each or 4.24 tons/yr total for the seven (7) furnaces.

CO = 1.5 lbs/hr * 8,760 hrs/yr * 2,000 lbs/ton = 6.57 tons/yr each, or 46.0 tons/yr total for the seven (7) furnaces.

- (2) Potential Natural Gas Combustion Emissions from Afterburners

AP-42 natural gas combustion factors were used to calculate emissions from the seven (7) afterburners rated at 0.002 million British thermal units per hour each or a total of 0.014 million British thermal units per hour as shown in Appendix A, Pages 1 and 2 of 3.

- (e) Electric Rotary Hearth Furnaces

Potential Process Emissions for Electric Rotary Hearth Furnaces (B1 - B8, B15, B16 and proposed B9 - B14)

Using the in-house stack test data for NO_x and CO results in the following:

NO_x = 0.0016 lbs/hr * 8,760 hrs/yr * 2,000 lbs/ton = 0.007 tons/yr each, or 0.112 tons/yr total for the sixteen (16) furnaces.

CO = 0.31 lbs/hr * 8,760 hrs/yr * 2,000 lbs/ton = 1.358 tons/yr each, or 21.7 tons/yr total for the sixteen (16) furnaces.

OAQ will require stack testing to validate these emission factors.

- (f) Automated Deflash Machine

The automated deflash machine (AD10) is deemed an insignificant activity since the flow rate is less than 4,000 actual cubic feet per minute coupled with a grain loading of less than 0.03 grains per actual cubic foot of exhaust air.

- (1) Potential Emissions for Automated Deflash Machine (AD10) Before Controls

The one (1) automated deflash machine, equipped with a self-contained dust collector with a 99.0% control efficiency, can process 974 pounds of carbon steel rods per hour. The potential PM and PM₁₀ emissions before controls are calculated as follows:

PM = 0.005 gr/acf * 3,000 acf/min * 60 min/hr * 8,760 hr/yr * 1 lb/7,000 gr * 1 ton/2,000 lbs / (1 - 0.990) = 56.3 tons/yr

and PM = PM₁₀

(2) Potential Emissions for Automated Deflash Machine (AD10) After Controls

$$PM = 108.9 \text{ tons/yr} * (1 - 0.990) = 0.563 \text{ tons/yr.}$$

$$\text{and } PM = PM_{10}$$

(g) Rework Sanders

The rework sanders are deemed an insignificant activity since the flow rates are less than 4,000 actual cubic feet per minute coupled with grain loadings of less than 0.03 grains per actual cubic foot of exhaust air.

A total of thirty six (36) hand rework sanders are equipped with dust collectors with a 99.5% control efficiency. The sanders are used as a final step in the production process to finish the connecting rods. Each rework sander can process 492 pounds per hour maximum process rate. Metaldyne has cited the US EPA Fire Database 6.23 to calculate the potential PM emissions before controls for finishing operations (3-04-003-60) as follows:

(1) Potential Emissions for Rework Sanders Before Controls

PM Emissions Before Controls

$$PM = (\text{Maximum Throughput})(\text{Emission Factor})(8,760 \text{ hrs/yr})(1 \text{ ton}/2,000 \text{ lbs})(36 \text{ sanders})$$

$$PM = (492 \text{ lbs/hr})(1 \text{ ton}/2,000 \text{ lbs})(0.01 \text{ lb PM/ton})(8,760 \text{ hrs/yr})(1 \text{ ton}/2,000 \text{ lbs})(36 \text{ sanders})$$

$$PM = 0.39 \text{ tons/year total}$$

PM₁₀ Emissions Before Controls

$$PM_{10} = (\text{Maximum Throughput})(\text{Emission Factor})(8,760 \text{ hrs/yr})(1 \text{ ton}/2,000 \text{ lbs})(36 \text{ sanders})$$

$$PM_{10} = (492 \text{ lbs/hr})(1 \text{ ton}/2,000 \text{ lbs})(0.0045 \text{ lbs PM/ton})(8,760 \text{ hrs/yr})(1 \text{ ton}/2,000 \text{ lbs})(36 \text{ sanders})$$

$$PM_{10} = 0.17 \text{ tons/year total}$$

(2) Potential Emissions for Rework Sanders After Controls

$$PM \text{ Emissions} = 0.39 \text{ tons/yr} * (1 - 0.995) = 0.002 \text{ tons/yr total}$$

$$PM_{10} \text{ Emissions} = 0.17 \text{ tons/yr} * (1 - 0.995) = 0.0009 \text{ tons/yr total}$$

(3) Potential Emissions Based on Grain Loading

However, based on the grain loading of the control device, the following emission calculations were presented in Source Modification 079-10884-00014, issued August 10, 1999.

$$PM = 0.005 \text{ gr/acf} \times 3,000 \text{ acf/min} \times 60 \text{ min/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ lb}/7,000 \text{ gr} \times 1 \text{ ton}/2,000 \text{ lbs}/(1 - 0.995)$$

$$PM = 112.6 \text{ tons/yr each or } 11 \times 112.6 \text{ tons/yr} = 1,239 \text{ tons/yr total}$$

$$\text{and } PM = PM_{10}$$

The potential PM emissions after controls for the eleven (11) rework sander dust collectors are calculated as follows:

$$\text{PM Emissions} = 1,239 \text{ tons/yr} \times (1 - 0.995) = 6.19 \text{ tons/yr total.}$$

and PM equal PM₁₀

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls of the entire source including the proposed equipment. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1,868
PM ₁₀	1,868
SO ₂	1.62
VOC	1.79
CO	69.9
NO _x	14.0

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPS	Potential To Emit (tons/year)
TOTAL	0.729

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) 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 emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls of the proposed facilities and insignificant activities. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	126
PM ₁₀	126
SO ₂	0.00
VOC	0.685
CO	13.4
NO _x	0.641

HAPS	Potential To Emit (tons/year)
TOTAL	0.00001

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM₁₀ are equal to or greater than twenty-five (25) tons per year.

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 will be satisfied by the proposed permit for the proposed emission units, control equipment and insignificant activities under 326 IAC 2-7-5(16).

Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

Proposed Modification

PTE from the proposed addition of new facilities and insignificant activities (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (tons/yr)	PM₁₀ (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO_x (tons/yr)
Proposed Modification	0.631	0.632	0.00001	0.685	13.4	0.641
Existing Source	10.2	10.2	1.62	1.11	63.1	13.9
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increases are less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	1.29
PM ₁₀	1.29
SO ₂	0.00
VOC	2.01
CO	25.4
NO _x	1.94
HAPS	1.96

Potential to Emit After Issuance For the Entire Source

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM₁₀	SO₂	VOC	CO	NO_x	HAPS
Delube Furnaces (A1, A2, A3, A5, A6, A7 and A8)	0.0001	0.0005	0.00004	0.0003	46.00	4.24	0.0001
Rotary Hearth Furnaces (B1 - B16)	-	-	-	-	21.7	0.112	-

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPS
Secondary Deflash Machines (SD1 - SD9)	0.687	0.687	-	-	-	-	-
Shot Peens (SP1 - SP7)	2.21	2.21	-	-	-	-	-
Insignificant Activities	17.4	17.4	1.62	1.79	2.20	9.60	0.729
Total Emissions	21.5	21.5	1.62	1.79	69.9	14.0	0.729

County Attainment Status

The source is located in Jennings County.

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

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jennings County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Jennings County has been classified as attainment or unclassifiable for all remaining 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.

(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 emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This Part 70 does not involve a pollutant-specific emissions unit with the potential to emit after control in an amount equal to or greater than one hundred (100) tons per year. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (c) The insignificant activities (degreasing operations and parts washers) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T (40 CFR 63.460-469) since no halogenated HAP solvents are used.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New source toxics control)

The potential HAPS emissions from the entire source, including all of the proposed facilities is only 0.729 tons per year. Therefore, the proposed facilities are not major for HAPS and thus this rule does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of PM₁₀ in Jennings County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as 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).

326 IAC 5-1 (Opacity Emissions Limitations)

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

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

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

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate shall be limited by the following:

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

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

The allowable PM emission rates shall not exceed the following based upon the process weight rates listed in the table:

Operation	Process Weight Rate	Allowable PM Emission Rate (pounds per hour)	Potential PM Emission Rate After Controls (pounds per hour)
Delube Furnaces (A1, A2, A3, A5 & A6)	0.720 tons/hr each (1,440 lbs/hr each)	3.29 each	0.000 each 0.000 total
Delube Furnaces (A7 & A8)	1.44 tons/hr each (2,880 lbs/hr each)	5.24 each	0.000 each 0.000 total
Rotary Hearth Furnaces (B1 - B14)	0.525 tons/hr each (1,050 lbs/hr each)	2.66 each	0.000 each 0.000 total
Rotary Hearth Furnaces (B15 & B16)	1.05 tons/hr each (2,100 lbs/hr each)	4.24 each	0.000 each 0.000 total
Secondary Deflash Machines (SD1 - SD9)	0.500 tons/hr each (1,000 lbs/hr each)	2.58 each	0.017 each 0.157 total
Shot Peens (SP1 - SP4, & SP6)	1.00 tons/hr each (2,000 lbs/hr each)	4.10 each	0.072 each
Shot Peens (SP5 & SP7)	2.40 tons/hr each (4,800 lbs/hr each)	7.37 each	0.072 each
Automated Deflash Machine (AD10) (Insignificant Activity)	0.600 tons/hr (1,200 lbs/hr)	2.91	0.129

Operation	Process Weight Rate	Allowable PM Emission Rate (pounds per hour)	Potential PM Emission Rate After Controls (pounds per hour)
Rework Sanders (G1 - G36) (Insignificant Activities)	0.250 tons/hr each (500 lbs/hr each)	1.62 each	0.172 each

Therefore all facilities comply with the allowable PM emission rates.

The baghouses shall be in operation at all times the shoot peens are in operation, in order to comply with the above limits. The self-contained dust collector shall be in operation at all times the automated deflash machine is in operation, in order to comply with the above limit.

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the compacting presses, known as CP1 through CP8, double disk grinders, known as DD1 through DD6, forge presses, known as F1 through F16, magna flux machines, known as MF1 through MF5 and MF7, mazak machines, brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations shall be limited by the following:

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

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

The wet process for the double disk grinders and the control devices for the grinding and machining operations, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations shall be in operation at all times.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-45, 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 from paved and unpaved roads and parking lots with public access.

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

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator 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.

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

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following 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 (38EC) (one hundred degrees Fahrenheit (100EF));
 - (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 (38EC) (one hundred degrees Fahrenheit (100EF)), 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 (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (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 of 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 construction of which commenced after July 1, 1990, 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.

Testing Requirements

- (a) Previous Stack Tests
 - (1) Pursuant to CP 079-9994, PM stack testing of a primary and a secondary deflash machine as well as a shot peen machine was performed on May 5 and 6, 1999. All three (3) machines were in compliance with the allowable PM emission rates pursuant to 326 IAC 6-3-2.
 - (2) Pursuant to CP 079-4413, PM stack testing of a primary and a secondary deflash machine was performed on May 13 and 14, 1997. The actual process weight rate was 813.2 pounds per hour which corresponds to an allowable PM emission rate of 2.24 pounds per hour and the stack test reported 0.078 pounds of PM per hour and 0.573 pounds of PM per hour for each set of deflash machines. Although the IDEM, OAQ stack test results summary implies that compliance could not be determined with the permit because of different capacities, the actual results comply with 326 IAC 6-3 at the tested process weight rate which is the present process weight rate of 814 pounds per hour.
- (b) Proposed Stack Tests

Testing is being required for the proposed automated deflash machine (AD10) since it was required in SSM 079-10884 and was never done. Stack testing will also be required for the shot peen machine SP7 since its throughput is greater than those previously stack tested on May 5 and 6, 1999. Those tests verified that the emissions from the smaller shot peens were well within the allowable PM limits.
- (c) Verification of Alternative Emission Factors for Delube and Rotary Hearth Furnaces

Although in-house stack testing was performed on March 14, 2000, IDEM, OAQ will require that one (1) of the delube and one (1) of the rotary hearth furnaces be tested for CO and NO_x. A stack test protocol should be submitted to IDEM for approval prior to testing and that the stack tests are scheduled appropriately so that IDEM, OAQ can observe the testing, if desired.

Compliance Requirements

Permits issued under 326 IAC 2-7 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, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit 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 Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

- (a) The delube and rotary hearth furnaces have no applicable compliance monitoring conditions.
- (b) The secondary deflash machines have applicable compliance monitoring conditions as specified below:

Visible emissions notations of the secondary deflash machines, SD1 through SD9, shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. 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 response steps for when an abnormal emission is observed.

Parametric monitoring is not required for the secondary deflash machines because the dust collectors are of an open design and pressure drop cannot be measured as noted in the IDEM, OAQ stack test summary.

These monitoring conditions are necessary because the dust collectors for the secondary deflash machines must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (c) The shot peen machines have applicable compliance monitoring conditions as specified below:
 - (1) Visible emissions notations of the shot peen machines (SP1 through SP7) exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. 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 response steps for when an abnormal emission is observed.

- (2) The Permittee shall record the total static pressure drop across the baghouses (SPD 1 - SPD7) controlling the shot peen machines (SP1 - SP7), at least or once per shift when the shot peens are in operation. When for any one (1) reading, the pressure drop across the baghouses is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (3) An inspection shall be performed each calendar quarter of all bags controlling the operations at this source when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (4) In the event that bag failure has been observed:
 - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.
 - (B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (5) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the baghouses for the shot peen machines must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The construction of the proposed facilities and the operation of this iron automotive connecting rods and steel forging source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 079-12982-00014**.

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

**Company Name: Metaldyne Sintered Components
Address City IN Zip: 3100 North State Highway # 3, North Vernon, Indiana 47265
Part 70: T 079-12982
Plt ID: 079-00014
Reviewer: Frank P. Castelli
Date: November 15, 2000**

Revised 11/15/01

Afterburners for Delube Furnaces
Rated at 0.002 MMBtu/hr each

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
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0.0140	0.123
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Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0001	0.0005	0.00004	0.006	0.0003	0.005

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

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

Company Name: Metaldyne Sintered Components
Address City IN Zip: 3100 North State Highway # 3, North Vernon, Indiana 47265
Part 70: T 079-12982
Pit ID: 079-00014
Reviewer: Frank P. Castelli
Date: November 15, 2000

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.29E-07	7.36E-08	4.60E-06	1.10E-04	2.08E-07

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	3.07E-08	6.75E-08	8.58E-08	2.33E-08	1.29E-07	1.157E-04

Methodology is the same as page 1.

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

Appendix A: Emissions Calculations
SUMMARY

Company Name: Metaldyne Sintered Components
Address City IN Zip: 3100 North State Highway # 3, North Vernon, Indiana 47265
Part 70: T 079-12982
Plt ID: 079-00014
Reviewer: Frank P. Castelli
Date: November 15, 2000

Entire Source Emission Units	Before Controls (tons per year)						
	PM	PM10	VOC	SO2	NOx	CO	HAPs
Shot Peens SP1 - SP7	441.5	441.5	0.000	0.000	0.000	0.000	0.000
Secondary Deflash Machines SD1 - SD9	68.7	68.7	0.000	0.000	0.000	0.000	0.000
Delube Furnaces A1, A2, A3, A5, A6, A7 & A8	0.0001	0.0005	0.0003	0.00004	4.24	46.0	0.0001
Rotary Hearth Furnaces B1 - B16	0.000	0.000	0.000	0.000	0.112	21.7	0.000
Automated Deflash Machine AD10	108.900	108.9	0.000	0.000	0.000	0.000	0.000
Rework Sanders (36)	1239.000	1,239	0.000	0.000	0.000	0.000	0.000
Other Insignificant Activities	10.1	10.1	0.782	1.62	9.60	2.2	0.5
Ink Jet Operations	0.000	0.000	0.320	0.000	0.000	0.000	0.229
Parts Washers	0.000	0.000	0.685	0.000	0.000	0.000	0.000
Total	1868.2	1868.2	1.79	1.62	14.0	69.9	0.729

Entire Source Emission Units	After Controls (tons per year)						
	PM	PM10	VOC	SO2	NOx	CO	HAPs
Shot Peens SP1 - SP7	2.21	2.21	0.000	0.000	0.000	0.000	0.000
Secondary Deflash Machines SD1 - SD9	0.687	0.687	0.000	0.000	0.000	0.000	0.000
Delube Furnaces A1, A2, A3, A5, A6, A7 & A8	0.0001	0.0005	0.0003	0.00004	4.24	46.0	0.0001
Rotary Hearth Furnaces B1 - B16	0.000	0.000	0.000	0.000	0.112	21.7	0.000
Automated Deflash Machine AD10	1.09	1.09	0.000	0.000	0.000	0.000	0.000
Rework Sanders (36)	6.190	6.19	0.000	0.000	0.000	0.000	0.000
Other Insignificant Activities	10.1	10.1	0.782	1.62	9.60	2.2	0.5
Parts Washers	0.000	0.000	0.685	0.000	0.000	0.000	0.000
Ink Jet Operations	0.000	0.000	0.320	0.000	0.000	0.000	0.229
Total	20.3	20.3	1.79	1.62	14.0	69.9	0.729

Proposed Emission Units	Before Controls (tons per year)						
	PM	PM10	VOC	SO2	NOx	CO	HAPs
Shot Peens SP6 & SP7	126.1	126.1	0.000	0.000	0.000	0.000	0.000
Delube Furnace A8	0.00001429	0.00007143	0.00004286	0.000006	0.60571429	6.57142857	0.00001429
Rotary Hearth Furnaces B9 - B14	0.000	0.000	0.000	0.000	0.035	6.781	0.000
Insignificant Activities							
Parts Washers	0.000	0.000	0.685	0.000	0.000	0.000	0.000
Total	126.1	126.1	0.685	0.00001	0.641	13.4	0.00001429

Proposed Emission Units	After Controls (tons per year)						
	PM	PM10	VOC	SO2	NOx	CO	HAPs
Shot Peens SP6 & SP7	0.6	0.6	0.0	0.0	0.0	0.0	0.0
Delube Furnace A8	0.00001429	0.00007143	0.00004286	0.000006	0.60571429	6.57	0.00001429
Rotary Hearth Furnaces B9 - B14	0.000	0.000	0.000	0.000	0.035	6.781	0.000
Insignificant Activities							
Parts Washers	0.000	0.000	0.685	0.000	0.000	0.000	0.000
Total	0.631	0.632	0.685	0.00001	0.641	13.4	0.00001429