

January 8, 2003

Re: STALCOP 011-16229-00047

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02



Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Stalcorp L.P.
1217 West Main Street
Thorntown, Indiana 46071**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 011-16229-00047	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 8, 2003

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary cold forming process.

Authorized Individual: Vice President of Operations
Source Address: 1217 West Main Street, Thorntown, Indiana 46071
Mailing Address: 1217 West Main Street, Thorntown, Indiana 46071
General Source Phone: (765) 436-7926
SIC Code: 3499
County Location: Boone
Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (1) Six (6) natural gas-fired heaters, constructed in 1997, each with a maximum heat input capacity of 0.120 million British thermal units per hour, exhausting through stacks C1 through C6;
 - (2) One (1) natural gas-fired heater, constructed in 2000, with a maximum heat input capacity of 0.300 million British thermal units per hour, exhausting through stack C7; and
 - (3) One (1) natural gas-fired heater, constructed in 1997, with a maximum heat input capacity of 0.414 million British thermal units per hour, exhausting through stack C8.
- (b) One (1) heat treating process, consisting of the following equipment:
 - (1) Two (2) electric brazing/annealing furnaces, constructed in 1993 and 1995, respectively, each with a maximum capacity of five (5) pounds per hour, and both exhausting through stack BA1; and
 - (2) One (1) electric annealing furnace, constructed in 1998, with a maximum capacity of eight (8) pounds per hour, and exhausting through Stack A1.
- (c) One (1) cleaning area consisting of the following:

- (1) One (1) acid copper cleaning line, designated as the "Bright Dip Line", constructed in 2000, with a maximum solvent usage rate of 0.93 gallons per hour, consisting of several dip tanks containing various cleaners and rinses;
 - (2) One (1) cleaning line, designated as the "De-Scale Line", constructed in 2000, with a maximum solvent usage rate of 0.16 gallons per hour, consisting of several dip tanks containing various cleaners and rinses; and
 - (3) One (1) vibratory burnisher, constructed in 2000, used to brighten and clean both copper and steel parts.
- (d) One (1) fabrication area, constructed between 1993 and 1998, consisting of the following:
- (1) Pressing;
 - (2) Machining;
 - (3) Threading;
 - (4) Grinding;
 - (5) Sanding; and
 - (6) Metal cutting and welding.
- (e) One (1) open top vapor degreaser, identified as EU1, originally constructed in 2000, to be modified to use trichloroethylene, with a maximum solvent usage of 5.5 gallons of trichloroethylene per day, exhausting to the atmosphere.
- (f) One (1) ultrasonic vapor degreaser, identified as EU2, originally constructed in 2002, to be modified to use trichloroethylene, with a maximum solvent usage of 0.1 gallons of trichloroethylene per day, exhausting to the atmosphere.
- (g) Two (2) ultrasonic vapor degreasers, identified as EU3 and EU4, using trichloroethylene, each with a maximum solvent usage of 0.1 gallons of trichloroethylene per day, exhausting to the atmosphere.

A.3 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:

It is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

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.

B.2 Definitions

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

B.3 Effective Date of the Permit [IC13-15-5-3]

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

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

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

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).
- (e) Pursuant to 326 IAC 2-7-4(a)(1)(A)(ii) and 326 IAC 2-5.1-4, the Permittee shall apply for a Title V operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.

B.8 NESHAP Reporting Requirement

Pursuant to the National Emission Standards for Hazardous Air Pollutants (NESHAP), Part 63.460, Subpart T, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- (a) Commencement of construction date (no later than 30 days after such date);
- (b) Actual start-up date (within 15 days after such date); and
- (c) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

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

The application and enforcement of these standards have been delegated to the IDEM, OAQ. The requirements of 40 CFR Part 60 are also federally enforceable.

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

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

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
- (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 extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 PMP's 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 PMP whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.11 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.12 Source Modification [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.13 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.14 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.15 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, 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 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 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 an "authorized individual" 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 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 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.10 Compliance Response Plan - Preparation and Implementation

- (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, 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) 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.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1] :

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (1) Six (6) natural gas-fired heaters, constructed in 1997, each with a maximum heat input capacity of 0.120 million British thermal units per hour, exhausting through stacks C1 through C6;
 - (2) One (1) natural gas-fired heater, constructed in 2000, with a maximum heat input capacity of 0.300 million British thermal units per hour, exhausting through stack C7; and
 - (3) One (1) natural gas-fired heater, constructed in 1997, with a maximum heat input capacity of 0.414 million British thermal units per hour, exhausting through stack C8.
- (b) One (1) heat treating process, consisting of the following equipment:
 - (1) Two (2) electric brazing/annealing furnaces, constructed in 1993 and 1995, respectively, each with a maximum capacity of five (5) pounds per hour, and both exhausting through stack BA1; and
 - (2) One (1) electric annealing furnace, constructed in 1998, with a maximum capacity of eight (8) pounds per hour, and exhausting through Stack A1.
- (c) One (1) cleaning area consisting of the following:
 - (1) One (1) acid copper cleaning line, designated as the "Bright Dip Line", constructed in 2000, with a maximum solvent usage rate of 0.93 gallons per hour, consisting of several dip tanks containing various cleaners and rinses;
 - (2) One (1) cleaning line, designated as the "De-Scale Line", constructed in 2000, with a maximum solvent usage rate of 0.16 gallons per hour, consisting of several dip tanks containing various cleaners and rinses; and
 - (3) One (1) vibratory burnisher, constructed in 2000, used to brighten and clean both copper and steel parts.
- (d) One (1) fabrication area, constructed between 1993 and 1998, consisting of the following:
 - (1) Pressing;
 - (2) Machining;
 - (3) Threading;
 - (4) Grinding;
 - (5) Sanding; and
 - (6) Metal cutting and welding.

(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 2-6.1]

D.1.1 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 Permittee shall ensure that the following requirements are met for the Bright Dip Line and the cleaner tank of the De-Scale Line:

- (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.1.2 Volatile Organic Compounds [326 IAC 8-3-5]

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) for cold cleaning operations without remote solvent reservoirs constructed after July 1, 1990:

- (a) The Permittee shall ensure that the following requirements are met for the Bright Dip Line and the cleaner tank of the De-Scale Line:
 - (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) measure 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 used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The Permittee shall ensure that the following requirements are met for the Bright Dip Line and the cleaner tank of the De-Scale Line:
- (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.1.3 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission 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.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

- (e) One (1) open top vapor degreaser, identified as EU1, originally constructed in 2000, to be modified to use trichloroethylene, with a maximum solvent usage of 5.5 gallons of trichloroethylene per day, exhausting to the atmosphere.
- (f) One (1) ultrasonic vapor degreaser, identified as EU2, originally constructed in 2002, to be modified to use trichloroethylene, with a maximum solvent usage of 0.1 gallons of trichloroethylene per day, exhausting to the atmosphere.
- (g) Two (2) ultrasonic vapor degreasers, identified as EU3 and EU4, using trichloroethylene, each with a maximum solvent usage of 0.1 gallons of trichloroethylene per day, exhausting to the atmosphere.

(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 2-6.1]

D.2.1 General Provisions Relating to NESHAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the open top vapor degreaser (EU1) and the three (3) Ultrasonic vapor degreasers (EU2, EU3, and EU4) described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

D.2.2 Halogenated Solvent Cleaning Machine NESHAP [326 IAC 20] [40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

- (a) That pursuant to 40 CFR 63.463(a) and (b), the Permittee shall conform to the following design requirements:
 - (1) The cleaning machine shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
 - (2) The cleaning machine shall be employed with a control combination of freeboard refrigeration device and a freeboard ratio of 1.0.

OR

The Permittee shall demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.22 kilograms per hour per square meter (0.045 pounds per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465(a) and appendix A to 40 CFR 63 Subpart T.

- (b) That pursuant to 40 CFR 63.463(d), the following work and operational practice requirements for the degreasing operation are applicable:
 - (1) Control air disturbances across the cleaning machine opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine

or maintenance or monitoring is being performed that requires the cover(s) to not be in place.

- (2) The parts baskets or the parts being cleaned in the cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - (3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
 - (4) Parts shall be oriented so that the solvents drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.
 - (5) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - (6) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - (7) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - (8) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - (9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.
 - (10) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.
 - (11) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - (12) Sponges, fabric, wood, and paper products shall not be cleaned.
- (c) That pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:
- (1) The Permittee shall conduct monitoring of each control device used to comply with §63.463 as provided in 40 CFR 63. 466, monitoring procedures.
 - (2) Determine during each monitoring period if the control device used to comply with the above standards meets the following requirements:

- (A) The Permittee shall ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket of the freeboard refrigeration device is no greater than 30% of the solvent's boiling point.
 - (B) When using a working-mode cover the Permittee shall:
 - (i) ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.
 - (ii) ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
 - (C) When using an idling-mode cover the Permittee shall:
 - (i) ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
 - (ii) ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.
- (3) An exceedance has occurred if :
- (A) the requirements of paragraphs (c)(2)(B)(i) and (c)(2)(C)(i) of this condition are not met; and
 - (B) the requirements of paragraphs (c)(2)(A), (c)(2)(B)(ii), and (c)(2)(C)(ii) of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be remeasured immediately upon adjustment or repair and demonstrated to be within the required limits.
- (4) The owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468.

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

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations), for open top vapor degreasing operations (EU1) constructed after January 1, 1980, the Permittee shall:

- (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;
- (c) Minimize solvent carry-out by:
 - (1) Racking parts to allow complete drainage;
 - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
 - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;

- (4) Tipping out any pools of solvent on the cleaned parts before removal;
- (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-6]

Pursuant to 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements), for open top vapor degreasing operations (EU1) with an air to solvent interface of ten and eight-tenths (10.8) square feet or greater and constructed after July 1, 1990, the Permittee shall ensure that the following requirements are met:

- (a) The Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
 - (2) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch shuts off spray pump if the vapor level drops more than four (4) inches.
 - (3) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) Equip the degreaser with one (1) of the following control devices:
 - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powdered cover if the degreaser opening is greater than ten and eight-tenths (10.8) square feet; or
 - (B) A refrigerated chiller; or

- (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser; or
 - (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifty (50) cubic feet per minute per square foot of air to vapor interface area and an average of less than twenty-five parts per million of solvent is exhausted over one (1) complete adsorption cycle; or
 - (E) Other systems of demonstrated equivalent or better control as those outlined in (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The Permittee shall ensure that the following operating requirements are met:
- (1) Keep the cover closed at all times except when processing workloads through the degreaser;
 - (2) Minimize solvent carryout emissions by:
 - (A) Racking articles to allow complete drainage;
 - (B) Moving articles in and out of the degreaser at less than eleven feet per minute;
 - (C) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) Tipping out any pools of solvent on the cleaned articles before removal; and
 - (E) Allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
 - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood or rope;
 - (4) Prohibit occupation of more than one half ($\frac{1}{2}$) of the degreaser's open top area with the workload;
 - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than four (4) inches when the workload is removed;
 - (6) Prohibit solvent spraying above the vapor level;
 - (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately;
 - (8) Store waste solvent only in covered containers and prohibit the disposal transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent (by weight) could evaporate;
 - (9) Prohibit the exhaust ventilation rate from exceeding sixty-five cubic feet per minute per square foot of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration (OSHA) requirements;

- (10) Prohibit the use of workplace fans near the degreaser opening;
- (11) Prohibit visually detectable water in the solvent exiting the water separator.

D.2.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emissions units and any control devices.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.6 Monitoring Procedures [326 IAC 2-7-6(1)]

Pursuant to 40 CFR 63.466, the Permittee shall comply with the following monitoring procedures:

- (a) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraph(s) below:
 - (1) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket of the freeboard refrigeration device, during the idling mode.
- (b) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified in paragraph below:
 - (1) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- (c) The Permittee shall monitor the hoist speed as described below:
 - (1) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.
 - (2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.
 - (3) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.
 - (4) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.7 Recordkeeping Requirements

- (a) The Permittee shall maintain, in written or electronic form, records of the following information specified below, for the life time of the machine,
 - (1) Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.

- (2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - (3) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.
- (b) The Permittee shall maintain, in written or electronic form, records of the following information specified below for a period of 5 years:
- (1) The results of control device monitoring required under 40 CFR 63.466.
 - (2) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (3) Estimates of annual solvent consumption for each solvent cleaning machine.

D.2.8 Reporting Requirements

- (a) The Permittee shall submit an initial notification report immediately. The report shall include the following information:
- (1) The name and address of the owner or operator.
 - (2) The address of the solvent cleaning machine.
 - (3) A brief description of each solvent cleaning machine including machine type, solvent/air interface area, and existing controls.
 - (4) The date of installation for the solvent cleaning machine.
 - (5) The anticipated compliance approach for the solvent cleaning machine.
 - (6) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.
- (b) The Permittee shall submit an initial statement of compliance for the solvent cleaning machine no later than 150 days after the start up date. This statement shall include:
- (1) The name and the address of the owner or operator.
 - (2) The address (i.e., physical location) of the solvent cleaning machine(s).
 - (3) A list of the control equipment used to achieve compliance for solvent cleaning machine.
 - (4) For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.
- (c) The Permittee shall submit an annual report by February 1 of each year following the one for which the reporting is being made. This report shall include the requirements as follows:

- (1) A signed statement from the facility owner or his designee stating that , “All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463(d)(10).”
 - (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- (d) The Permittee shall submit an exceedance report to the commissioner semiannually except when, the commissioner determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR 63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calender half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:
- (1) Information on the actions taken to comply with 40 CFR 63. 463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- (e) That pursuant to 40 CFR 63.463 (i), the Permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:
- (1) The source has demonstrated a full year of compliance without an exceedance.
 - (2) The Permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T
 - (3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.
- (f) The Permittee of a solvent cleaning machine requesting an equivalency determination, as described in 40 CFR 63.469 shall submit an equivalency request report to the commissioner and receive an approval prior to startup.
- (g) The information required in (a) through (f) above shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Stalcop L.P.
Address:	1217 West Main Street
City:	Thorntown
Phone #:	(765)436-7926
MSOP #:	011-16229-00047

I hereby certify that Stalcop L.P. is still in operation.
 no longer in operation.

I hereby certify that Stalcop L.P. is in compliance with the requirements of MSOP 011-16229-00047.
 not in compliance with the requirements of MSOP 011-16229-00047.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

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

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

January 8, 2003

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

**Technical Support Document (TSD) for a New Source Construction and
Minor Source Operating Permit**

Source Background and Description

Source Name: Stalcop L.P.
Source Location: 1217 West Main Street, Thorntown, Indiana 46071
County: Boone
SIC Code: 3499
Operation Permit No.: 011-16229-00047
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed an application from Stalcop L.P. relating to the construction, modification, and operation of the following:

Stalcop L.P. plans to construct the following equipment. This equipment had been previously permitted in Registration 011-15247-00047 issued April 2, 2002. However the equipment has not yet been constructed and now the source wishes to change the solvent used to trichloroethylene based solvent.

Two (2) ultrasonic vapor degreasers, identified as EU3 and EU4, using trichloroethylene, each with a maximum solvent usage of 0.1 gallons of trichloroethylene per day, exhausting to the atmosphere.

Stalcop L.P. plans to modify the following degreasers to use trichloroethylene based solvent. They previously used a n-propyl bromide, a VOC but not a HAP.

One (1) open top vapor degreaser, identified as EU1, originally constructed in 2000, to be modified to use trichloroethylene, with a maximum solvent usage of 5.5 gallons of trichloroethylene per day, exhausting to the atmosphere.

One (1) ultrasonic vapor degreasers, identified as EU2, originally constructed in 2000, to be modified to use trichloroethylene, with a maximum solvent usage of 0.1 gallons of trichloroethylene per day, exhausting to the atmosphere.

Existing Permitted Emission Units and Pollution Control Equipment

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (1) Six (6) natural gas-fired heaters, constructed in 1997, each with a maximum heat input capacity of 0.120 million British thermal units per hour, exhausting through stacks C1 through C6;

- (2) One (1) natural gas-fired heater, constructed in 2000, with a maximum heat input capacity of 0.300 million British thermal units per hour, exhausting through stack C7; and
 - (3) One (1) natural gas-fired heater, constructed in 1997, with a maximum heat input capacity of 0.414 million British thermal units per hour, exhausting through stack C8.
- (b) One (1) heat treating process, consisting of the following equipment:
- (1) Two (2) electric brazing/annealing furnaces, constructed in 1993 and 1995, respectively, each with a maximum capacity of five (5) pounds per hour, and both exhausting through stack BA1; and
 - (2) One (1) electric annealing furnace, constructed in 1998, with a maximum capacity of eight (8) pounds per hour, and exhausting through Stack A1.
- (c) One (1) cleaning area consisting of the following:
- (1) One (1) acid copper cleaning line, designated as the "Bright Dip Line", constructed in 2000, with a maximum solvent usage rate of 0.93 gallons per hour, consisting of several dip tanks containing various cleaners and rinses;
 - (2) One (1) cleaning line, designated as the "De-Scale Line", constructed in 2000, with a maximum solvent usage rate of 0.16 gallons per hour, consisting of several dip tanks containing various cleaners and rinses; and
 - (3) One (1) vibratory burnisher, constructed in 2000, used to brighten and clean both copper and steel parts.
- (d) One (1) fabrication area, constructed between 1993 and 1998, consisting of the following:
- (1) Pressing;
 - (2) Machining;
 - (3) Threading;
 - (4) Grinding;
 - (5) Sanding; and
 - (6) Metal cutting and welding.
- (e) One (1) open top vapor degreaser, identified as EU1, originally constructed in 2002, to be modified to use trichloroethylene, with a maximum solvent usage of 5.5 gallons of trichloroethylene per day, exhausting to the atmosphere.
- (f) One (1) ultrasonic vapor degreaser, identified as EU2, originally constructed in 2002, to be modified to use trichloroethylene, with a maximum solvent usage of 0.1 gallons of trichloroethylene per day, exhausting to the atmosphere.

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 Prior Approval

The source plans to construct the following emission units and pollution control devices:

- (g) Two (2) ultrasonic vapor degreasers, identified as EU3 and EU4, using trichloroethylene, each with a maximum solvent usage of 0.1 gallons of trichloroethylene per day, exhausting to the atmosphere.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) R011-15247-00047, issued April 2, 2002; and
- (b) R011-12192-00047, issued August 25, 2000.

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

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
C1-C6	Six 0.12 MMBtu/hr heaters	15 each	0.5 each	Unknown	Unknown
C7	0.300 MMBtu/hr heater	15	0.5	Unknown	Unknown
C8	0.414 MMBtu/hr heater	15	0.5	Unknown	Unknown
BA1	2 Brazing/Annealing Furnaces	15	1	Unknown	Unknown
A1	Annealing Furnace	10	1	Unknown	Unknown

Recommendation

The staff recommends to the Commissioner that the construction and operation 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.

A complete application for the purposes of this review was received on July 23, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit 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, the department, or the appropriate local air pollution control agency.”

The values in the table reflect potential to emit of the source after the modification.

Pollutant	Potential To Emit (tons/year)
PM	1.45
PM-10	1.45
SO ₂	0
VOC	16.39
CO	0.5
NO _x	0.6

HAP's	Potential To Emit (tons/year)
Trichloroethylene	12.87
Manganese	0.05
Other	Negligible
TOTAL	12.92

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) 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 twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Boone 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. Boone 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) Boone County has been classified as attainment or unclassifiable for all 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 or 40 CFR 52.21, and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and

volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1.56
PM10	1.56
SO ₂	0.01
VOC	21.75*
CO	0.21
NO _x	1.0

*Note that the VOC emissions are actually less after the modification than before. This is due to the fact that VOC content of the new solvent is less than the VOC content of the solvent previously used.

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the TSD for R011-15247-00047, issued April 2, 2002.

Proposed Modification

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

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0	0	0	12.87	0	0
PSD or Offset Threshold Level	250	250	250	250	250	250

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

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This modified source is subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

a single hazardous air pollutant (HAP) is greater than or equal to 10 tons per year.

This new source shall apply for a Part 70 (Title V) operating permit within twelve (12) months after this source becomes subject to Title V.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) The one (1) open top degreaser and the three (3) ultrasonic vapor degreasers are subject to the requirements of 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning) because each unit uses a solvent containing greater than five percent (5%) trichloroethylene by weight. Pursuant to this rule, the Permittee shall comply with the following requirements:

Emission Limitations and Standards

- (1) That pursuant to 40 CFR 63.463(a) & (b), the Permittee shall conform to the following design requirements:
- (A) The cleaning machine shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
 - (B) The cleaning machine shall be employed with a control combination of freeboard refrigeration device and a freeboard ratio of 1.0.

OR

The Permittee shall demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.22 kilograms per hour per square meter (0.045 pounds per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465(a) and appendix A to 40 CFR 63 Subpart T.

- (2) That pursuant to 40 CFR 63.463(d), the following work and operational practice requirements for the degreasing operation are applicable:
- (A) Control air disturbances across the cleaning machine opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
 - (B) The parts baskets or the parts being cleaned in the cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - (C) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
 - (D) Parts shall be oriented so that the solvents drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.
 - (E) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - (F) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.

- (G) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - (H) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - (I) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.
 - (J) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.
 - (K) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - (L) Sponges, fabric, wood, and paper products shall not be cleaned.
- (3) That pursuant to 40 CFR 63.463(e), the Permittee shall comply with the following requirements:
- (A) The Permittee shall conduct monitoring of each control device used to comply with §63.463 as provided in 40 CFR 63.466, monitoring procedures.
 - (B) Determine during each monitoring period if the control device used to comply with the above standards meets the following requirements:
 - (i) The Permittee shall ensure that the chilled air blanket temperature (in EF), measured at the center of the air blanket of the freeboard refrigeration device is no greater than 30% of the solvent's boiling point.
 - (ii) When using a working-mode cover the Permittee shall:
 - (a) ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.
 - (b) ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
 - (iii) When using an idling-mode cover the Permittee shall:
 - (a) ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.

- (b) ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.
- (C) An exceedance has occurred if :
 - (i) the requirements of paragraphs (c)(2)(B)(i) and (c)(2)(C)(i) of this condition are not met; and
 - (ii) the requirements of paragraphs (c)(2)(A), (c)(2)(B)(ii), and (c)(2)(C)(ii) of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be remeasured immediately upon adjustment or repair and demonstrated to be within the required limits.
- (D) The owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468.

Compliance Monitoring Requirements

- (1) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraph(s) below:
 - (A) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket of the freeboard refrigeration device, during the idling mode.
- (2) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate , specified in paragraph below:
 - (A) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- (3) The Permittee shall monitor the hoist speed as described below:
 - (A) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.
 - (B) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.
 - (C) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.
 - (D) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

Record Keeping and Reporting Requirements

- (1) The Permittee shall submit an initial notification report immediately. The report shall include the following information:
 - (A) The name and address of the owner or operator.
 - (B) The address of the solvent cleaning machine.
 - (C) A brief description of each solvent cleaning machine including machine type, solvent/air interface area, and existing controls.
 - (D) The date of installation for the solvent cleaning machine.
 - (E) The anticipated compliance approach for the solvent cleaning machine.
 - (F) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.

- (2) The Permittee shall submit an initial statement of compliance for the solvent cleaning machine no later than 150 days after the start up date. This statement shall include:
 - (A) The name and the address of the owner or operator.
 - (B) The address (i.e., physical location) of the solvent cleaning machine(s).
 - (C) A list of the control equipment used to achieve compliance for solvent cleaning machine.
 - (D) For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.

- (3) The Permittee shall submit an annual report by February 1 of each year following the one for which the reporting is being made. This report shall include the requirements as follows:
 - (A) A signed statement from the facility owner or his designee stating that ,
"All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463(d)(10)."
 - (B) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.

- (4) The Permittee shall submit an exceedance report to the commissioner semiannually except when, the commissioner determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR 63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:
 - (A) Information on the actions taken to comply with 40 CFR 63. 463(e) and (f). This information shall include records of written or verbal orders for

replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

- (B) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - (C) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- (5) That pursuant to 40 CFR 63.463(i), the Permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:
- (A) The source has demonstrated a full year of compliance without an exceedance.
 - (B) The Permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T
 - (C) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.
- (6) The Permittee of a solvent cleaning machine requesting an equivalency determination, as described in 40 CFR 63.469 shall submit an equivalency request report to the commissioner and receive an approval prior to startup.
- (7) The information required in (1) through (6) above shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:
- 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
- (c) The Bright Dip and De-Scale lines are not subject to the requirements of 40 CFR 63, Subpart T (National Emissions Standards for Halogenated Solvent Cleaning) because these lines do not use a solvent containing greater than 5 percent (5%) by weight of any halogenated solvent listed in 40 CFR 63.460(a).
 - (d) This source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring. In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and, 3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount required for a source to be classified as a major source. The open top vapor degreaser (EU1) has the potential to emit greater than ten (10) tons per year of a single HAP. However, this unit is not subject to a HAP emission limit. Therefore, this source is not subject to CAM.
 - (e) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source even though the source is a major source of

HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) because the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because this source has not had and will not have after this modification, potential to emit greater than two hundred fifty (250) tons per year of any pollutant in an area designated as attainment for all criteria pollutants and it is not one (1) of the twenty-eight (28) source categories.

326 IAC 2-4.1 (New Source Toxics Rule)

- (a) 326 IAC 2-4.1 (New Source Toxics Rule) does not apply to the cleaning area even though it was constructed after July 27, 1997 because the potential to emit from the cleaning area of any single HAP is less than ten (10) tons per year and the potential to emit any combination of HAPs is less than twenty-five (25) tons per year.
- (b) The open top degreaser (EU1) is not subject to the requirements of 326 IAC 2-4.1 (New Source Toxics Control) because it is subject to 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning).
- (c) The three (3) ultrasonic vapor degreasers (EU2, EU3, and EU4) are not subject to the requirements of 326 IAC 2-4.1 (New Source Toxics Control) even though they were constructed after July 27, 1997 because the degreasers do not have the potential to emit greater than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs. Also the degreasers are subject to 40 CFR 63, Subpart T (National Emissions Standards for Halogenated Solvent Cleaning) and are therefore exempted from this rule [326 IAC 2-4.1-1 (b)(2)].

326 IAC 2-6 (Emission Reporting)

This source is located in Boone County and the potential to emit of all pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (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 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.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because the source is located in Boone County, was constructed after January 1, 1980, and does not have the potential to emit one hundred (100) tons per year of VOC.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This source is not subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) because it is located in Boone County.

State Rule Applicability - Heat Treating Process

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission 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.

State Rule Applicability - Cleaning Area

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) does not apply to the cleaning area because the cleaning area does not emit any particulate.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

326 IAC 8-1-6 (New Facilities; General Reduction Requirements) does not apply to the cleaning area even though it was constructed after 1980 because the cleaning area is regulated under 326 IAC 8-3-2 (Cold Cleaner Operation) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control).

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

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for the Bright Dip Line and the cleaner tanks of the de-scale line constructed after January 1, 1980, the Permittee 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)

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) for cold cleaning operations without remote solvent reservoirs constructed after July 1, 1990:

- (a) The owner or operator of Bright Dip Line and the cleaner tanks of the de-scale line shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kilopascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measure 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 used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The owner or operator of Bright Dip Line and the cleaner tanks of the de-scale line 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.

State Rule Applicability - Fabrication Area

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission 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.

State Rule Applicability - Open Top Degreaser (EU1)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) does not apply to the open top degreaser (EU1) because the open top degreaser does not emit any particulate.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

326 IAC 8-1-6 (New Facilities; General Reduction Requirements) does not apply to the open top degreaser even though it was constructed after 1980 because the open top degreaser (EU1) is regulated under 326 IAC 8-3-3 (Open Top Vapor Degreaser Operation) and 326 IAC 8-3-6 (Open Top Degreaser Operation and Control Requirements).

326 IAC 8-3-3 (Open Top Vapor Degreaser Operation)

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations), for open top vapor degreasing operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;
- (c) Minimize solvent carry-out by:
 - (1) Racking parts to allow complete drainage;
 - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
 - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) Tipping out any pools of solvent on the cleaned parts before removal;
 - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements)

Pursuant to 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements), for open top vapor degreasing operations with an air to solvent interface of ten and eight-tenths (10.8) square feet or greater and constructed after July 1, 1990, the Permittee shall ensure that the following requirements are met:

- (a) The Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
 - (2) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch shuts off spray pump if the vapor level drops more than four (4) inches.
 - (3) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) Equip the degreaser with one (1) of the following control devices:
 - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powdered cover if the degreaser opening is greater than ten and eight-tenths (10.8) square feet; or
 - (B) A refrigerated chiller; or
 - (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser; or
 - (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifty (50) cubic feet per minute per square foot of air to vapor interface area and an average of less than twenty-five parts per million of solvent is exhausted over one (1) complete adsorption cycle; or
 - (E) Other systems of demonstrated equivalent or better control as those outlined in (A) through (D). Such systems shall be submitted to the U.S.EPA as a SIP revision.
- (b) The Permittee shall ensure that the following operating requirements are met:
- (1) Keep the cover closed at all times except when processing workloads through the degreaser;
 - (2) Minimize solvent carryout emissions by:
 - (A) Racking articles to allow complete drainage;
 - (B) Moving articles in and out of the degreaser at less than eleven feet per minute;
 - (C) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) Tipping out any pools of solvent on the cleaned articles before removal; and
 - (E) Allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry;

- (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood or rope;
- (4) Prohibit occupation of more than one half ($\frac{1}{2}$) of the degreaser's open top area with the workload;
- (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than four (4) inches when the workload is removed;
- (6) Prohibit solvent spraying above the vapor level;
- (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately;
- (8) Store waste solvent only in covered containers and prohibit the disposal transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent (by weight) could evaporate;
- (9) Prohibit the exhaust ventilation rate from exceeding sixty-five cubic feet per minute per square foot of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration (OSHA) requirements;
- (10) Prohibit the use of workplace fans near the degreaser opening;
- (11) Prohibit visually detectable water in the solvent exiting the water separator.

State Rule Applicability - Three (3) Ultrasonic Vapor Degreasers (EU2, EU3, and EU4)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) does not apply to the three (3) ultrasonic vapor degreasers (EU2, EU3, and EU4) because they do not emit any particulate.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

326 IAC 8-1-6 (New Facilities; General Reduction Requirements) does not apply to the three (3) Ultrasonic vapor degreasers (EU2, EU3, and EU4) even though they were constructed after 1980 because they individually do not have the potential to emit twenty-five (25) tons per year of VOC.

326 IAC 8-3-2 (Cold Cleaner Operation) and 326 IAC 8-3-5 (Cold Cleaner Operation and Control)

The three (3) Ultrasonic vapor degreasers (EU2, EU3, EU4) are not subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operation) or 326 IAC 8-3-5 (Cold Cleaner Operation and Control) because they are not cold cleaners.

326 IAC 8-3-3 (Open Top Vapor Degreaser Operation) and 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements)

The three (3) Ultrasonic vapor degreasers (EU2, EU3, EU4) are not subject to the requirements of 326 IAC 8-3-3 (Open Top Vapor Degreaser Operation) or 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements) because they are closed vapor degreasers, not open top vapor degreasers.

326 IAC 8-3-4 (Conveyorized Degreaser Operations) and 326 IAC 8-3-7 (Conveyorized Degreaser Operation and Control)

The three (3) Ultrasonic vapor degreasers (EU2, EU3, EU4) are not subject to the requirements of 326 IAC 8-3-4 (Conveyorized Degreaser Operations) or 326 IAC 8-3-7 (Conveyorized Degreaser Operation and Control) because they are not conveyorized.

Conclusion

The construction and operation of this cold forming process shall be subject to the conditions of the attached New Source Construction and Minor Source Operating Permit 011-16229-00047.

Emissions from Existing Units

Company Name: Stalcorp L.P.
 Address City IN Zip: 1217 West Main Street, Thorntown, IN 46071
 Permit Number: T011-16229-00047
 Pit ID: 011-00047
 Reviewer: ERG/KC
 Date: 08/14/2002

Fabrication Area

1 MIG Welder and 1 TIG Welder

Number of Welders: 2

Electrode Usage Rate (lb/hr): 2

Pollutant	Ef (lb pollutant/ lb electrode)	Emissions (ton/yr)
PM	0.037	0.65
PM10	0.037	0.65
Manganese	0.003	0.05

1 Stick Welder

Number of Welders: 1

Electrode Usage Rate (lb/hr): 1

Pollutant	Ef (lb pollutant/ lb electrode)	Emissions (ton/yr)
PM	0.0211	0.09
PM10	0.0211	0.09
Manganese	0.0009	0.004

1 Flame Cutter

Number of Cutters: 1

Maximum Cutting Rate (kin/yr): 8760

Pollutant	Ef (lb pollutant/ kin metal cut)	Emissions (ton/yr)
PM	0.1622	0.71
PM10	0.1622	0.71
Manganese	0.0005	0.002
Chromium (Cr)	0.0003	0.001
Nickel (Ni)	0.0001	0.0004

Descale Line

Maximum Solvent Usage (gal/hr): 0.16

Solvent Density (lb/gal): 0.95

VOC Fraction (lb VOC/lb material): 0.09

$$0.16 \text{ (gal/hr)} * 0.95 \text{ (lb/gal)} * 0.09 \text{ (lb VOC/lb material)} * 8760 \text{ (hr/yr)} / 2000 \text{ (lb/ton)} = 0.06 \text{ ton VOC/yr}$$
Bright Dip Line

Maximum Solvent Usage (gal/hr): 0.93

Solvent Density (lb/gal): 9.44

VOC Fraction (lb VOC/lb material): 0.09

$$0.93 \text{ (gal/hr)} * 9.44 \text{ (lb/gal)} * 0.09 \text{ (lb VOC/lb material)} * 8760 \text{ (hr/yr)} / 2000 \text{ (lb/ton)} = 3.46 \text{ ton VOC/yr}$$

Note: There are no emissions from the vibratory burnisher or the annealing furnace. Emissions from the brazing/annealing furnaces are negligible.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Company Name: Stalcop L.P.
Address City IN Zip: 1217 West Main Street, Thorntown, IN 46071
Permit Number: T011-16229-00047
Plt ID: 011-00047
Reviewer: ERG/KC
Date: 08/14/2002

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.4

12.6

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.6	0.0	0.5

**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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

HAPs Emissions

Company Name: Stalcop L.P.
Address City IN Zip: 1217 West Main Street, Thorntown, IN 46071
Permit Number: T011-16229-00047
Plt ID: 011-00047
Reviewer: ERG/KC
Date: 08/14/2002

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.319E-05	7.537E-06	4.711E-04	1.131E-02	2.136E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.140E-06	6.909E-06	8.793E-06	2.387E-06	1.319E-05

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: Emission Calculations

VOC and HAP Emissions for Modified Units

Company Name: Stalcop L.P.

Address City IN Zip: 1217 West Main Street, Thorntown, IN 46071

Permit Number: T011-16229-00047

Plt ID: 011-00047

Reviewer: ERG/KC

Date: 08/14/2002

One (1) Open Top Vapor Degreaser (EU1)

VOC

1 (degreasers) * 5.5 (gal solvent/day/degreaser) * 12.16 (lb/gal solvent) / 24 (hr/day) = 2.79 lb solvent/hr

2.79 (lb solvent/hr) * 1 (lb VOC/lb solvent) * 8760 (hr/yr) / 2000 (lb/ton) = 12.2 ton VOC/yr

Trichloroethylene

1 (degreasers) * 5.5 (gal solvent/day/degreaser) * 12.16 (lb/gal solvent) / 24 (hr/day) = 2.79 lb solvent/hr

2.79 (lb solvent/hr) * 1 (lb thrichloroethylene/lb solvent) * 8760 (hr/yr) / 2000 (lb/ton) = 12.2 ton thrichloroethylene/yr

Three (3) Ultrasonic Vapor Degreasers (EU2-EU4)

VOC

3 (degreasers) * 0.1 (gal solvent/day/degreaser) * 12.16 (lb/gal solvent) / 24 (hr/day) = 0.15 lb solvent/hr

0.15 (lb solvent/hr) * 1 (lb VOC/lb solvent) * 8760 (hr/yr) / 2000 (lb/ton) = 0.67 ton VOC/yr

Trichloroethylene

3 (degreasers) * 0.1 (gal solvent/day/degreaser) * 12.16 (lb/gal solvent) / 24 (hr/day) = 0.15 lb solvent/hr

0.15 (lb solvent/hr) * 1 (lb thrichloroethylene/lb solvent) * 8760 (hr/yr) / 2000 (lb/ton) = 0.67 ton thrichloroethylene/yr