NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a Minor Source Operating Permit (MSOP)

for Sunright America, Inc. in Bartholomew County

MSOP Renewal No.: M005-42152-00110

The Indiana Department of Environmental Management (IDEM) has received an application from Sunright America, Inc. located at 6205 S. International Drive, Columbus, Indiana 47201 for a renewal of its MSOP issued on August 14, 2015. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Sunright America, Inc. to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Bartholomew County Public Library
536 5th Street
Columbus, IN 47201

and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

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

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

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will
make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M 005-42152-00110 in all correspondence.

**Comments should be sent to:**

Michaela Hecox  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGDN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Michaela Hecox or (317) 233-3031  
Or dial directly: (317) 233-3031  
Fax: (317) 232-6749 attn: Michaela Hecox  
E-mail: MHecox@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm) and the Citizens’ Guide to IDEM on the Internet at [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).

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

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

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

[Signature]

Brian Williams, Section Chief  
Permits Branch  
Office of Air Quality
Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Sunright America, Inc.
6205 S. International Drive
Columbus, Indiana 47201

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

This permit is issued 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

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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 and A.2 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 automotive metal fastener operation.

Source Address: 6205 S. International Drive, Columbus, Indiana 47201
General Source Phone Number: (812) 342-3430
SIC Code: 3452 (Bolts, Nuts, Screws, Rivets, and Washers)
County Location: Bartholomew
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit Program
Minor Source, under PSD and Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) Sixteen (16) natural gas-fired comfort heating units, identified as CH1 - CH12 (constructed in 2008), CH13 and CH14 (constructed in 2012), and CH15 and CH16 (constructed in 2017), with a total maximum capacity of 6.116 MMBtu/hr, with emissions uncontrolled, and exhausting through stacks SCH1 through SCH16, respectively.

(b) One (1) natural gas-fired endothermic generator, identified as EG1, constructed in 2014, with a maximum capacity of 0.159 MMBtu/hr, with emissions uncontrolled, and exhausting to stack S1.

(c) Fifty-five (55) cold forming machines, identified as N1 through N55, constructed between 2002 and 2019, each with a maximum capacity of 220 pounds of parts per hour, using electrostatic precipitators EP1 through EP55 as control, and exhausting indoors.

(d) One hundred nine (109) tapping machines, identified as T1 through T109, constructed between 2002 and 2014, with a maximum capacity of 80 pounds of parts per hour, with emissions uncontrolled, and exhausting indoors.

(e) Two (2) cutting machines, identified as C1 and C2, constructed in 2005 and 2010, with a maximum capacity of 15.2 pounds of parts per hour, with emissions uncontrolled, and exhausting indoors.

(f) One (1) thread rolling machine, identified as TR1, constructed in 2005, with a maximum capacity of 75 pounds of parts per hour, with emissions uncontrolled, and exhausting indoors.
(g) One (1) heat treating line, identified as HT-1, constructed in 2014, with a maximum capacity of 1,320 pounds of metal parts per hour, with emissions uncontrolled, exhausting to stacks, and consisting of the following:

1. One (1) pre-rinse operation.
2. One (1) natural gas-fired quench furnace, identified as QF1, constructed in 2014, with a maximum capacity of 0.952 MMBtu/hr, with emissions uncontrolled, and exhausting to stacks S2, S3, and S4.
3. One (1) quench oil bath, with a maximum oil usage of 3.6648 gallons per day.
4. One (1) post rinse operation.
5. One (1) natural gas-fired tempering furnace, identified as TF1, constructed in 2014, with a maximum capacity of 0.952 MMBtu/hr, with emissions uncontrolled, and exhausting to stacks S5 and S6.

(h) One (1) parts degreaser without a remote solvent reservoir, identified as PW-1, constructed in 2008, with a maximum capacity of 84.23 gallons of solvent per year, with emissions uncontrolled, and exhausting indoors.

(i) One (1) torquer dip coating line, identified as TC-1, constructed in 2013, with a maximum capacity of 3.75 gallons of coating per hour and 50,000 metal parts per hour, with emissions uncontrolled, and exhausting indoors.

(j) One (1) natural gas-fired torquer curing oven, identified as TO1, constructed in 2013, with a maximum capacity of 0.09 MMBtu/hr, with emissions uncontrolled, and exhausting indoors.

(k) One (1) maintenance welding operation, identified as MW, with a maximum capacity of 5.0 pounds of electrode consumed per week, with emissions uncontrolled, exhausting indoors, and consisting of the following:

1. One (1) TIG, constructed in 2013.
2. One (1) MIG, constructed in 2014.
3. One MIG, constructed in 2010.

(l) One (1) maintenance metalworking operation, identified as MM, with a maximum capacity of 7 pounds of metal per hour, with emissions uncontrolled, exhausting indoors, and consisting of a drill press, brake press, mill, hydraulic press, bench grinder and assorted hand tools.

(m) One (1) quality assurance welding operation, identified as QA1, constructed in 2017, consisting of two (2) spot welders, with a combined maximum capacity of 5.0 pounds of electrode consumed per week, with emissions uncontrolled, and exhausting indoors.

(n) One (1) natural gas-fired burn-off oven, identified as BO-1, constructed in 2017, with a total maximum input capacity of 0.238 MMBtu/hr and a maximum throughput of 2,646 pounds of metal parts per hour, with emissions uncontrolled, exhausting through stack S7, and consisting of the following:

1. One (1) automatic loading and feeding system.
2. One (1) purified hot water pre-rinse operation.
3. One (1) air drying operation at room temperature.
4. One (1) burn-off operation consisting of:
   (i) Zone one (1), with a maximum input capacity of 0.119 MMBtu/hr.
   (ii) Zone two (2), with a maximum input capacity of 0.119 MMBtu/hr.
(o) One (1) Geomet dip spin coating line, identified as DS-1, constructed in 2018, with a maximum capacity of 1.93 gallons of coating per hour and 1,874 pounds of metal parts processed per hour, with emissions uncontrolled, exhausting outdoors, and consisting of the following:

1. One (1) automatic loading and feeding system.
2. One (1) dip spin basket for coating metal parts.
3. One (1) purified hot water bath for dip spin basket.
4. One (1) LNG oven consisting of:
   (i) One (1) pre-drying zone with a maximum input capacity of 0.397 MMBtu/hr.
   (ii) One (1) pre-heating zone with a maximum input capacity of 0.397 MMBtu/hr.
   (iii) One (1) baking zone with a maximum input capacity of 0.793 MMBtu/hr.

(p) One (1) Myucon dip spin coating line, identified as DS-2, constructed in 2018, with a maximum capacity of 2.38 gallons of coating per hour and 992 pounds of metal parts processed per hour, with emissions uncontrolled, exhausting indoors, and consisting of the following:

1. One (1) automatic loading and feeding system.
2. One (1) dip spin basket for coating metal parts.
3. One (1) purified hot water bath for dip spin basket.
4. One (1) electric oven using only heated air.

(q) One (1) shot blaster, identified as SB-1, constructed in 2018, using steel abrasive, with a maximum metal throughput of 660 pounds per hour and a maximum abrasive throughput of 2,927.90 pounds per hour, using a cartridge filter for particulate control, and exhausting indoors.

(r) One (1) enclosed spray basket washer, identified as BW1, permitted in 2018, with a maximum capacity of 4 dip-spin coating baskets per hour, and exhausting indoors.

(s) Paved roads with public access.

(t) One (1) electrical resistance electrode spot welder, identified as ER-1, permitted in 2019, with a maximum usage of 5 pounds of electrodes per week, using no controls, and exhausting indoors.
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M005-42152-00110, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual 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) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

(c) 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.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M005-42152-00110 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee’s right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 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][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

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

B.18 Credible Evidence [326 IAC 1-1-6]

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

#### Emission Limitations and Standards  [326 IAC 2-6.1-5(a)(1)]

<table>
<thead>
<tr>
<th>C.1</th>
<th>Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C.2</th>
<th>Permit Revocation [326 IAC 2-1.1-9]</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:</td>
</tr>
<tr>
<td></td>
<td>(a) Violation of any conditions of this permit.</td>
</tr>
<tr>
<td></td>
<td>(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.</td>
</tr>
<tr>
<td></td>
<td>(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.</td>
</tr>
<tr>
<td></td>
<td>(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.</td>
</tr>
<tr>
<td></td>
<td>(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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C.3</th>
<th>Opacity [326 IAC 5-1]</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:</td>
</tr>
<tr>
<td></td>
<td>(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.</td>
</tr>
<tr>
<td></td>
<td>(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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C.4</th>
<th>Open Burning [326 IAC 4-1] [IC 13-17-9]</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C.5</th>
<th>Incineration [326 IAC 4-2] [326 IAC 9-1-2]</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.</td>
</tr>
</tbody>
</table>
C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

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

1. When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
2. If there is a change in the following:
   (A) Asbestos removal or demolition start date;
   (B) Removal or demolition contractor; or
   (C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements  [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]
(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test 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 IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements  [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]
The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11]
(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

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

1. initial inspection and evaluation;
2. recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
3. any necessary follow-up actions to return operation to normal or usual manner of operation.

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

1. monitoring results;
2. review of operation and maintenance procedures and records; and/or
3. inspection of the control device, associated capture system, and the process.

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.
Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and 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 emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(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.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.16 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Sixteen (16) natural gas-fired comfort heating units, identified as CH1 - CH12 (constructed in 2008), CH13 and CH14 (constructed in 2012), and CH15 and CH16 (constructed in 2017), with a total maximum capacity of 6.116 MMBtu/hr, with emissions uncontrolled, and exhausting through stacks SCH1 through SCH16, respectively.

(g) One (1) heat treating line, identified as HT-1, constructed in 2014, with a maximum capacity of 1,320 pounds of metal parts per hour, with emissions uncontrolled, exhausting to stacks, and consisting of the following:

1. One (1) pre-rinse operation.
2. One (1) natural gas-fired quench furnace, identified as QF1, constructed in 2014, with a maximum capacity of 0.952 MMBtu/hr, with emissions uncontrolled, and exhausting to stacks S2, S3, and S4.
3. One (1) quench oil bath, with a maximum oil usage of 3.6648 gallons per day.
4. One (1) post rinse operation.
5. One (1) natural gas-fired tempering furnace, identified as TF1, constructed in 2014, with a maximum capacity of 0.952 MMBtu/hr, with emissions uncontrolled, and exhausting to stacks S5 and S6.

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

Emission Limitations and Standards  [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate Emissions [326 IAC 6-2-4]

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Pt (lb/MBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comfort Heaters</td>
<td>CH1-CH14</td>
<td>0.6</td>
</tr>
<tr>
<td>Quench Furnace</td>
<td>QF1</td>
<td>0.6</td>
</tr>
<tr>
<td>Tempering Furnace</td>
<td>TF-1</td>
<td>0.6</td>
</tr>
<tr>
<td>Comfort Heaters</td>
<td>CH15-CH16</td>
<td>0.6</td>
</tr>
</tbody>
</table>
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(h) One (1) parts degreaser without a remote solvent reservoir, identified as PW-1, constructed in 2008, with a maximum capacity of 84.23 gallons of solvent per year, with emissions uncontrolled, and exhausting indoors.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

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

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

   (1) Equip the degreaser with a cover.

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

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

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

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

   (6) Store waste solvent only in closed containers.

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

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

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

      (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

      (B) A water cover when solvent used is insoluble in, and heavier than, water.

      (C) A refrigerated chiller.

      (D) Carbon adsorption.

      (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

   (2) Ensure the degreaser cover is designed so that it can be easily operated with
(3) If used, solvent spray:
   (A) must be a solid, fluid stream; and
   (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]
Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]
A Preventive Maintenance Plan is required for this facility and any associated control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Record Keeping and Reporting Requirements  [326 IAC 2-6.1-5(a)(2)]

D.2.4 Record Keeping Requirements
(a) To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
   (1) The name and address of the solvent supplier.
   (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
   (3) The type of solvent purchased.
   (4) The total volume of the solvent purchased.
   (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

| (i) | One (1) torquer dip coating line, identified as TC-1, constructed in 2013, with a maximum capacity of 3.75 gallons of coating per hour and 50,000 metal parts per hour, with emissions uncontrolled, and exhausting indoors. |
| (o) | One (1) Geomet dip spin coating line, identified as DS-1, constructed in 2018, with a maximum capacity of 1.93 gallons of coating per hour and 1,874 pounds of metal parts processed per hour, with emissions uncontrolled, exhausting outdoors, and consisting of the following: |
|     | (1) One (1) automatic loading and feeding system. |
|     | (2) One (1) dip spin basket for coating metal parts. |
|     | (3) One (1) purified hot water bath for dip spin basket. |
|     | (4) One (1) LNG oven consisting of: |
|         | (i) One (1) pre-drying zone with a maximum input capacity of 0.397 MMBtu/hr. |
|         | (ii) One (1) pre-heating zone with a maximum input capacity of 0.397 MMBtu/hr. |
|         | (iii) One (1) baking zone with a maximum input capacity of 0.793 MMBtu/hr. |
| (p) | One (1) Myucon dip spin coating line, identified as DS-2, constructed in 2018, with a maximum capacity of 2.38 gallons of coating per hour and 992 pounds of metal parts processed per hour, with emissions uncontrolled, exhausting indoors, and consisting of the following: |
|     | (1) One (1) automatic loading and feeding system. |
|     | (2) One (1) dip spin basket for coating metal parts. |
|     | (3) One (1) purified hot water bath for dip spin basket. |
|     | (4) One (1) electric oven using only heated air. |

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

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

**D.3.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]**

Pursuant to 326 IAC 8-2-9, for the torquer dip coating line, Geomet dip spin coating line, and Myucon dip spin coating line, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator at each dip coating line.


Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

(a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
(c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.3.4 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.3.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1. Records necessary to demonstrate compliance shall be available not later than 30 days after the end of each compliance period.

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

(2) The amount of coating material and solvent less water used on a monthly basis.

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

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

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
SECTION D.4  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(n) One (1) natural gas-fired burn-off oven, identified as BO-1, constructed in 2017, with a total maximum input capacity of 0.238 MMBtu/hr and a maximum throughput of 2,646 pounds of metal parts per hour, with emissions uncontrolled, exhausting through stack S7, and consisting of the following:

1. One (1) automatic loading and feeding system.
2. One (1) purified hot water pre-rinse operation.
3. One (1) air drying operation at room temperature.
4. One (1) burn-off operation consisting of:
   i. Zone one (1), with a maximum input capacity of 0.119 MMBtu/hr.
   ii. Zone two (2), with a maximum input capacity of 0.119 MMBtu/hr.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.4.1 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2 (Incinerators), the natural gas-fired burn-off oven, identified as BO-1, shall:

(a) Consist of primary and secondary chambers or the equivalent.
(b) Be equipped with a primary burner unless burning only wood products.
(c) Comply with 326 IAC 5-1 and 326 IAC 2.
(d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications.
(e) Not emit particulate matter in excess of one (1) of the following:
   1. Three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.
   2. Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.
(f) If any of the requirements of subdivisions (a) through (e) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
(g) The owner or operator of the incinerator must make the manufacturer's specifications available to the department upon request.
D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility and its associated control device. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
SECTION D.5  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(q) One (1) shot blaster, identified as SB-1, constructed in 2018, using steel abrasive, with a maximum metal throughput of 660 pounds per hour and a maximum abrasive throughput of 2,927.90 pounds per hour, using a cartridge filter for particulate control, and exhausting indoors.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.5.1 Particulate Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the shot blaster (SB-1) shall not exceed 6.07 pounds per hour when operating at a process weight rate of 1.79 tons per hour.

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

\[ E = 4.10 \ P^{0.67} \]

Where:

- \( E \) = rate of emission in pounds per hour
- \( P \) = process weight rate in tons per hour

D.5.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility and its associated control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.5.3 Particulate Control

In order to comply with Condition D.5.1, the cartridge filter for particulate control shall be in operation and control emissions from the shot blaster at all times the shot blaster is in operation.

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

D.5.4 Cartridge Filter Inspections

The Permittee shall perform quarterly inspections of the cartridge filter controlling particulate emissions from the shot blaster to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective filters shall be replaced.
Record Keeping and Reporting Requirement [326 IAC 2-6.1-5(a)(2)]

D.5.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.5.4, the Permittee shall maintain records of the dates and results of the inspections required under Condition D.5.4.

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

<table>
<thead>
<tr>
<th><strong>Company Name:</strong></th>
<th>Sunright America, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Source Address:</strong></td>
<td>6205 S. International Drive</td>
</tr>
<tr>
<td><strong>City:</strong></td>
<td>Columbus, Indiana  47201</td>
</tr>
<tr>
<td><strong>Phone #:</strong></td>
<td>(812) 342-3430</td>
</tr>
<tr>
<td><strong>MSOP #:</strong></td>
<td>M005-42152-00110</td>
</tr>
</tbody>
</table>

I hereby certify that Sunright America, Inc. is:  
- □ still in operation.  
- □ no longer in operation.

I hereby certify that Sunright America, Inc. is:  
- □ in compliance with the requirements of MSOP M005-42152-00110.  
- □ not in compliance with the requirements of MSOP M005-42152-00110.

### 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:

-  
-  
-
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 hydrogen sulfide, 25 tons/year total reduced sulfur, 25 tons/year reduced sulfur compounds, 25 tons/year fluorides, 100 tons/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:

________________________________________________________________________
________________________________________________________________________
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Minor Source Operating Permit (MSOP) Renewal

Source Description and Location

Source Name: Sunright America, Inc.
Source Location: 6205 S. International Drive, Columbus, IN 47201
County: Bartholomew
SIC Code: 3452 (Bolts, Nuts, Screws, Rivets, and Washers)
Permit Renewal No.: M 005-42152-00110
Permit Reviewer: Michaela Hecox

On November 4, 2019, Sunright America, Inc. submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Sunright America, Inc. relating to the operation of a stationary automotive metal fastener operation. Sunright America, Inc. was issued its first MSOP (M 005-35752-00110) on August 14, 2015.

Existing Approvals

The source was issued MSOP NSC No. M 005-35752-00110 on August 14, 2015. The source has since received the following approval:

(a) MSOP SPR No. 005-39971-00110, issued on September 17, 2018;
(b) MSOP AA No. 005-40764-00110, issued on December 26, 2018; and
(c) MSOP AA No. 005-41740-00110, issued on August 19, 2019.

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

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) Sixteen (16) natural gas-fired comfort heating units, identified as CH1 - CH12 (constructed in 2008), CH13 and CH14 (constructed in 2012), and CH15 and CH16 (constructed in 2017), with a total maximum capacity of 6.116 MMBtu/hr, with emissions uncontrolled, and exhausting through stacks SCH1 through SCH16, respectively.

(b) One (1) natural gas-fired endothermic generator, identified as EG1, constructed in 2014, with a maximum capacity of 0.159 MMBtu/hr, with emissions uncontrolled, and exhausting to stack S1.

(c) Fifty-five (55) cold forming machines, identified as N1 through N55, constructed between 2002 and 2019, each with a maximum capacity of 220 pounds of parts per hour, using electrostatic precipitators EP1 through EP55 as control, and exhausting indoors.

(d) One hundred nine (109) tapping machines, identified as T1 through T109, constructed between 2002 and 2014, with a maximum capacity of 80 pounds of parts per hour, with emissions uncontrolled, and exhausting indoors.
(e) Two (2) cutting machines, identified as C1 and C2, constructed in 2005 and 2010, with a maximum capacity of 15.2 pounds of parts per hour, with emissions uncontrolled, and exhausting indoors.

(f) One (1) thread rolling machine, identified as TR1, constructed in 2005, with a maximum capacity of 75 pounds of parts per hour, with emissions uncontrolled, and exhausting indoors.

(g) One (1) heat treating line, identified as HT-1, constructed in 2014, with a maximum capacity of 1,320 pounds of metal parts per hour, with emissions uncontrolled, exhausting to stacks, and consisting of the following:

1. One (1) pre-rinse operation.
2. One (1) natural gas-fired quench furnace, identified as QF1, constructed in 2014, with a maximum capacity of 0.952 MMBtu/hr, with emissions uncontrolled, and exhausting to stacks S2, S3, and S4.
3. One (1) quench oil bath, with a maximum oil usage of 3.6648 gallons per day.
4. One (1) post rinse operation.
5. One (1) natural gas-fired tempering furnace, identified as TF1, constructed in 2014, with a maximum capacity of 0.952 MMBtu/hr, with emissions uncontrolled, and exhausting to stacks S5 and S6.

(h) One (1) parts degreaser without a remote solvent reservoir, identified as PW-1, constructed in 2008, with a maximum capacity of 84.23 gallons of solvent per year, with emissions uncontrolled, and exhausting indoors.

(i) One (1) torquer dip coating line, identified as TC-1, constructed in 2013, with a maximum capacity of 3.75 gallons of coating per hour and 50,000 metal parts per hour, with emissions uncontrolled, and exhausting indoors.

(j) One (1) natural gas-fired torquer curing oven, identified as TO1, constructed in 2013, with a maximum capacity of 0.09 MMBtu/hr, with emissions uncontrolled, and exhausting indoors.

(k) One (1) maintenance welding operation, identified as MW, with a maximum capacity of 5.0 pounds of electrode consumed per week, with emissions uncontrolled, exhausting indoors, and consisting of the following:

1. One (1) TIG, constructed in 2013.
2. One (1) MIG, constructed in 2014.
3. One MIG, constructed in 2010.

(l) One (1) maintenance metalworking operation, identified as MM, with a maximum capacity of 7 pounds of metal per hour, with emissions uncontrolled, exhausting indoors, and consisting of a drill press, brake press, mill, hydraulic press, bench grinder and assorted hand tools.

(m) One (1) quality assurance welding operation, identified as QA1, constructed in 2017, consisting of two (2) spot welders, with a combined maximum capacity of 5.0 pounds of electrode consumed per week, with emissions uncontrolled, and exhausting indoors.

(n) One (1) natural gas-fired burn-off oven, identified as BO-1, constructed in 2017, with a total maximum input capacity of 0.238 MMBtu/hr and a maximum throughput of 2,646 pounds of metal parts per hour, with emissions uncontrolled, exhausting through stack S7, and consisting of the following:

1. One (1) automatic loading and feeding system.
2. One (1) purified hot water pre-rinse operation.
3. One (1) air drying operation at room temperature.
4. One (1) burn-off operation consisting of:
(i) Zone one (1), with a maximum input capacity of 0.119 MMBtu/hr.
(ii) Zone two (2), with a maximum input capacity of 0.119 MMBtu/hr.

(o) One (1) Geomet dip spin coating line, identified as DS-1, constructed in 2018, with a maximum capacity of 1.93 gallons of coating per hour and 1,874 pounds of metal parts processed per hour, with emissions uncontrolled, exhausting outdoors, and consisting of the following:

(1) One (1) automatic loading and feeding system.
(2) One (1) dip spin basket for coating metal parts.
(3) One (1) purified hot water bath for dip spin basket.
(4) One (1) LNG oven consisting of:
   (i) One (1) pre-drying zone with a maximum input capacity of 0.397 MMBtu/hr.
   (ii) One (1) pre-heating zone with a maximum input capacity of 0.397 MMBtu/hr.
   (iii) One (1) baking zone with a maximum input capacity of 0.793 MMBtu/hr.

(p) One (1) Myucon dip spin coating line, identified as DS-2, constructed in 2018, with a maximum capacity of 2.38 gallons of coating per hour and 992 pounds of metal parts processed per hour, with emissions uncontrolled, exhausting indoors, and consisting of the following:

(1) One (1) automatic loading and feeding system.
(2) One (1) dip spin basket for coating metal parts.
(3) One (1) purified hot water bath for dip spin basket.
(4) One (1) electric oven using only heated air.

(q) One (1) shot blaster, identified as SB-1, constructed in 2018, using steel abrasive, with a maximum metal throughput of 660 pounds per hour and a maximum abrasive throughput of 2,927.90 pounds per hour, using a cartridge filter for particulate control, and exhausting indoors.

(r) One (1) enclosed spray basket washer, identified as BW1, permitted in 2018, with a maximum capacity of 4 dip-spin coating baskets per hour, and exhausting indoors.

(s) Paved roads with public access.

(t) One (1) electrical resistance electrode spot welder, identified as ER-1, permitted in 2019, with a maximum usage of 5 pounds of electrodes per week, using no controls, and exhausting indoors.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

County Attainment Status

The source is located in Bartholomew County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
</tbody>
</table>
Pollutant | Designation
--- | ---
PM$_{10}$ | Unclassifiable effective November 15, 1990.
NO$_2$ | Unclassifiable or attainment effective January 29, 2012, for the 2010 NO$_2$ standard.
Pb | Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO$_x$) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO$_x$ emissions are considered when evaluating the rule applicability relating to ozone. Bartholomew County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO$_x$ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM$_{2.5}$
Bartholomew County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

**Fugitive Emissions**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of criteria pollutants and hazardous air pollutants (HAP) are counted toward the determination of MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

**Greenhouse Gas (GHG) Emissions**

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

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

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
<th>PM1</th>
<th>PM101</th>
<th>PM2.5(^1,2)</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitive Emissions(^*)</strong></td>
<td>54.63</td>
<td>47.69</td>
<td>47.69</td>
<td>0.03</td>
<td>4.33</td>
<td>75.10</td>
<td>3.72</td>
<td>4.90</td>
</tr>
<tr>
<td><strong>Title V Major Source Thresholds</strong></td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Including Source-Wide Fugitives(^*)</strong></td>
<td>54.65</td>
<td>47.69</td>
<td>47.69</td>
<td>0.03</td>
<td>4.33</td>
<td>75.10</td>
<td>3.72</td>
<td>4.90</td>
</tr>
<tr>
<td><strong>MSOP Thresholds</strong></td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt; 100</td>
<td>&lt; 25</td>
</tr>
</tbody>
</table>

\(^1\) Under the Part 70 Permit program (40 CFR 70), PM\(_{10}\) and PM\(_{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."

\(^2\) PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

\(^*\) Fugitive HAP emissions are always included in the source-wide emissions.

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated pollutants is less than 100 tons per year. However, PM10, PM2.5, and VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

**Potential to Emit After Issuance**

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.
### Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) (Uncontrolled/Unlimited)

<table>
<thead>
<tr>
<th></th>
<th>PM*</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
<th>SO_{2}</th>
<th>NO_{x}</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total PTE of</strong></td>
<td>54.63</td>
<td>47.69</td>
<td>47.69</td>
<td>0.03</td>
<td>4.33</td>
<td>75.10</td>
<td>3.72</td>
<td>4.90</td>
</tr>
<tr>
<td><strong>Entire Source Excluding Fugitive Emissions</strong>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>50</td>
<td>50</td>
<td>100</td>
<td>25</td>
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<tr>
<td><strong>Total PTE of</strong></td>
<td>54.65</td>
<td>47.69</td>
<td>47.69</td>
<td>0.03</td>
<td>4.33</td>
<td>75.10</td>
<td>3.72</td>
<td>4.90</td>
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<tr>
<td><strong>Entire Source Including Source-Wide Fugitives</strong>*</td>
<td></td>
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<td>Emission Offset Major Source Thresholds</td>
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<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>--</td>
</tr>
</tbody>
</table>

*Under the Part 70 Permit program (40 CFR 70), PM_{10} and PM_{2.5}, not particulate matter (PM), are each considered as a “regulated air pollutant.”

*PM_{2.5} listed is direct PM_{2.5}.

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

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

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

#### Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) are not included in the permit, because the heating units do not meet the definition of *steam generating unit* as defined by 326 IAC 60.41c.

(b) The requirements of the New Source Performance Standard for the following subparts are not included in the permit, because the burn-off oven is not considered an *incinerator*, *municipal waste combustor*, *municipal waste combustion unit*, *hospital/medical/infectious waste incinerator*, *commercial and industrial solid waste incineration (CISWI) unit*, or *other solid waste incineration (OSWI) unit or air curtain incinerator*.

(1) 40 CFR Part 60, Subpart E, Standards of Performance for Incinerators (326 IAC 12). The burn-off oven does not meet the definition of *incinerator*, as defined in 40 CFR 60.51.

(2) 40 CFR Part 60, Subpart Ea, Standards of Performance for Municipal Waste Combustors
for Which Construction is Commenced After December 20, 1989 and on or Before September 20, 1994 (326 IAC 12).

(3) 40 CFR Part 60, Subpart Eb, Standards of Performance for Large Municipal Waste Combustors For Which Construction is Commenced After September 20, 1994 or for Which Modification or Reconstruction is Commenced After June 19, 1996 (326 IAC 12).

(4) 40 CFR Part 60, Subpart Ec, Standards of Performance for New Stationary Sources: Hospital/Medical/Infectious Waste Incinerators For Which Construction is Commenced After June 20, 1996 (326 IAC 12).

(5) 40 CFR Part 60, Subpart AAAA, Standards of Performance for Small Municipal Waste Combustion Units For Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001 (326 IAC 12).


(7) 40 CFR Part 60, Subpart CCCC, Standards of Performance for Commercial and Industrial Solid Waste Incineration Units (326 IAC 12). The burn-off oven does not meet the definition of commercial and industrial solid waste incineration (CISWI) unit, as defined in 40 CFR 60.2265.

(8) 40 CFR Part 60, Subpart EEEE, Standards of Performance for Other Solid Waste Incineration Units For Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006 (326 IAC 12). The burn-off oven does not meet the definition of other solid waste incineration (OSWI) unit or air curtain incinerator, as defined in §60.2977.

(c) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T, are not included in the permit for the parts degreaser and the basket washer, since these units do not use any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) from Hazardous Waste Combustors, 40 CFR Part 60, Subpart EEE (326 IAC 20) are not included in the permit for the burn-off oven, since the unit does not meet the definition of a hazardous waste combustor, as defined in 40 CFR 63.1201.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM)(326 IAC 20-80) are not included in the permit for the dip spin coating lines or the basket washer, because the source is not located in or part of a major source of HAPs.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD)(326 IAC 20-95) are not included in the permit for the comfort heating units, because the comfort heating units do not meet the definition of boiler or process heater as defined by CFR 63.7575. Additionally, the source is not a major source of HAPs.
(e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH) are not included in the permit, because the source does not perform metal stripping operations, autobody refinishing operations, or apply coatings that contain compounds of chromium, lead, manganese, nickel, or cadmium.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers for Area Sources (40 CFR 63, Subpart JJJJJJJ) are not included in the permit for the comfort heating units, because the comfort heating units do not meet the definition of boiler or process heater as defined by CFR 63.11237.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations (40 CFR 63, Subpart WWWWWW) are not included in the permit for the basket washer, since the source is not a plating and polishing facility listed in 40 CFR 63.11504(a). The source does not perform any of the following processes:

- Electroplating other than chromium electroplating (i.e., non-chromium electroplating).
- Electroless or non-electrolytic plating.
- Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying.
- Dry mechanical polishing of finished metals and formed products after plating or thermal spraying.
- Electroforming.
- Electropolishing.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX) are not included in the permit, because the source is not primarily engaged in one of the nine source categories listed in this subpart.

(i) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

**Compliance Assurance Monitoring (CAM):**

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

### State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

**326 IAC 1-6-3 (Preventive Maintenance Plan)**
The source is subject to 326 IAC 1-6-3.

**326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**
MSOP applicability is discussed under the Potential to Emit After Issuance section of this document.

**326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**
PSD and Emission Offset applicability is discussed under the Potential to Emit After Issuance section of this document.
326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

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

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Bartholomew County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Bartholomew County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Bartholomew County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

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**State Rule Applicability – Individual Facilities**

State rule applicability has been reviewed as follows:

326 IAC 4-2-2 (Incinerators)
The burn-off oven (BO-1), is subject to 326 IAC 4-2-2 because it meets the definition of incinerator, as defined in 326 IAC 1-2-34. Pursuant to 326 IAC 4-2-2, incinerators shall comply with the following requirements:

(a) Consist of primary and secondary chambers or the equivalent.
(b) Be equipped with a primary burner unless burning only wood products.
(c) Comply with 326 IAC 5-1 and 326 IAC 2.
(d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications.
(e) Not emit particulate matter in excess of one (1) of the following:

(1) Three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.

(2) Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.

(f) If any of the requirements of subdivisions (a) through (e) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(g) The owner or operator of the incinerator must make the manufacturer's specifications available to the department upon request.

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

(a) Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

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

\[
Pt = \frac{1.09}{Q^{0.26}}
\]

Where:

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

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

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

| Indirect Heating Units Which Began Operation After September 21, 1983 |
|--------------------------|---------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| Facility                 | Construction Date (Removal Date) | Operating Capacity (MMBtu/hr) | Q (MMBtu/hr) | Calculated Pt (lb/MMBtu) | Particulate Limitation, (Pt) (lb/MMBtu) | PM PTE based on AP-42 (lb/MMBtu) |
| Comfort Heaters (CH1-CH14) | 2012 | 5.616 | 5.616 | 0.695 | 0.6 | 0.002 |
| Quench Furnace (QF1) | 2014 | 0.952 | 7.518 | 0.645 | 0.6 | 0.002 |
| Tempering Furnace (TF-1) | 2014 | 0.952 | 7.518 | 0.645 | 0.6 | 0.002 |
Indirect Heating Units Which Began Operation After September 21, 1983

<table>
<thead>
<tr>
<th>Facility</th>
<th>Construction Date (Removal Date)</th>
<th>Operating Capacity (MMBtu/hr)</th>
<th>Q (MMBtu/hr)</th>
<th>Calculated Pt (lb/MMBtu)</th>
<th>Particulate Limitation, Pt (lb/MMBtu)</th>
<th>PM PTE based on AP-42 (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comfort Heaters (CH15-CH16)</td>
<td>2017</td>
<td>0.5</td>
<td>8.018</td>
<td>0.634</td>
<td>0.6</td>
<td>0.002</td>
</tr>
</tbody>
</table>

Where: \( Q = \) Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.

Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed.

(b) Pursuant to 326 IAC 6-2-1, the requirements of 326 IAC 6-2 are not applicable to the torquer oven (TO1), the Geomet coating oven, and the burn-off oven (BO-1) because they are not considered combustion for indirect heating as defined in 326 IAC 1-2-19.

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

(a) Liquid and gaseous fuels and combustion air are excluded from the definition of process weight as defined in 326 IAC 1-2-59(a). Therefore, the natural gas combustion units are not subject to the requirements of 326 IAC 6-3-2.

(b) Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from the requirements of 326 IAC 6-3-2. Therefore, the cutting machines (C1 and C2) are not subject to the requirements of 326 IAC 6-3-2.

(c) Pursuant to 326 IAC 6-3-1(b)(9), welding operations that consume less than 625 pounds of rod or wire per day are exempt from 326 IAC 6-3-2. Therefore, the maintenance welding operation (MW) is not subject to the requirements of 326 IAC 6-3-2.

(d) Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from the requirements of 326 IAC 6-3-2. Therefore, the maintenance metalworking operation (MM) is not subject to the requirements of 326 IAC 6-3-2.

(e) Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the shot blaster (SB-1), since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the shot blaster (SB-1) shall not exceed 6.07 pounds per hour when operating at a process weight rate of 1.79 tons per hour. The pound per hour limitation was calculated with the following equation:

\[ E = 4.10 \times P^{0.67} \]

where \( E = \) rate of emission in pounds per hour and \( P = \) process weight rate in tons per hour.

Summary of Process Weight Rate Limits

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
<th>Equation Used</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shot Blaster (SB-1)</td>
<td>1.79</td>
<td>6.07</td>
<td>(a)</td>
</tr>
</tbody>
</table>
The cartridge filter shall be in operation at all times the shot blaster is in operation, in order to comply with this limit.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
The source is not subject to 326 IAC 326 IAC 7-1.1 because the source has a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
(a) Even though, the natural gas combustion units, the cold forming machines (N1 through N55), the tapping machines (T1 through T109), the cutting machines (C1 and C2), the thread rolling machine (TR1), the heat treating line (HT-1), the parts degreaser (PW-1), the torquer dip coating line (TC-1), the Myucon dip spin coating line (DS-2), the burn-off oven (BO-1), and the enclosed spray basket washer (BW1) were each constructed after January 1, 1980, each facility is not subject to the requirements of 326 IAC 8-1-6 because each facilities unlimited VOC potential emissions is less than twenty-five (25) tons per year.

(b) Pursuant to 326 IAC 8-1-6(3)(A), the Geomet dip spin coating line (DS-1) is not subject to the requirements of 326 IAC 8-1-6, because it is subject to other provisions of 326 IAC 8.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
(a) Pursuant to 326 IAC 8-2-1(a) and 326 IAC 8-2-9(a), the torquer dip coating line (TC-1), Geomet dip spin coating line (DS-1), and the Myucon dip spin coating line (DS-2) are each subject to the requirements of 326 IAC 8-2-9, since they were constructed in 2013 and 2018, located in Bartholomew County, and has the unlimited PTE of VOC equal to or greater than fifteen (15) pounds of VOC per day before add-on controls, and this source performs miscellaneous metal surface coating and the source is classified under the SIC group 34.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the torquer dip coating line (TC-1), Geomet dip spin coating line (DS-1), and the Myucon dip spin coating line (DS-2) shall be not exceed 3.5 pounds of VOC per gallon of coating less water.

Based on the information provided by the source the coatings used in the torquer dip coating line (TC-1), Geomet dip spin coating line (DS-1), and the Myucon dip spin coating line (DS-2) are compliant coatings.

(b) The torquer dip coating line (TC-1), Geomet dip spin coating line (DS-1), and the Myucon dip spin coating line (DS-2) are also subject to the work practices specified under 326 IAC 8-2-9(f).

326 IAC 8-3-2 (Cold Cleaner Degreaser Operation)
Pursuant to 326 IAC 8-3-1(c)(2)(A)(ii), the parts degreaser (PW-1), is subject to the requirements of 326 IAC 8-3-2, because it is a cold cleaner degreaser without a remote solvent reservoir constructed after July 1, 1990.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreaser)
Pursuant to 326 IAC 8-3-1(c)(3)(B), the parts degreaser (PW-1), is subject to the requirements of 326 IAC 8-3-8, because it is a cold cleaner degreaser that uses a solvent containing one or more VOCs.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the source, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to the source, since this source is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).
Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this source are as follows:

Torquer dip coating line (TC-1), Geomet dip spin coating line (DS-1), and the Myucon dip spin coating line (DS-2) - Volatile Organic Compounds (VOC)

(1) Compliance with VOC content limitations under 326 IAC 8-2-9 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Emission Unit / Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shot Blaster (SB-1) / Cartridge filter</td>
<td>Baghouse Inspections</td>
<td>Quarterly</td>
<td>Verify that it is operated and maintained per manufacturer's specifications</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the cartridge filter for the shot blaster (SB-1) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes were made to conditions contained previously issued permits/approvals (these changes may include Title I changes):

(1) The permit term has been updated and is now on a fixed term of ten (10) years.

(2) All affidavit language has been removed.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on November 4, 2019.

The operation of this stationary automotive metal fastener operation shall be subject to the conditions of the attached proposed MSOP Renewal No. 005-42152-00110.

The staff recommends to the Commissioner that the MSOP Renewal be approved.
(a) If you have any questions regarding this permit, please contact Michaela Hecox, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-3031 or (800) 451-6027, and ask for Michaela Hecox or (317) 233-3031.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
## Appendix A: Emissions Calculations

### PTE Summary

**Company Name:** Sunright America, Inc.  
**Source Address:** 6205 S. International Drive, Columbus, IN 47201  
**MSOP Renewal No.:** 005-42152-00110  
**Reviewer:** Michaela Hecox  
**Date:** 12/16/2019

### Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas Combustion</td>
<td>0.08</td>
<td>0.32</td>
<td>0.32</td>
<td>0.03</td>
<td>4.23</td>
<td>0.23</td>
<td>3.56</td>
<td>0.08</td>
</tr>
<tr>
<td>Burn Off Oven</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.00</td>
<td>0.10</td>
<td>0.01</td>
<td>0.99</td>
<td>1.93E-03</td>
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<tr>
<td>Endothermic Generator Process Emissions</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.08</td>
<td>-</td>
</tr>
<tr>
<td>Cold Forming Machines</td>
<td>Negl.</td>
<td>Negl.</td>
<td>Negl.</td>
<td>-</td>
<td>-</td>
<td>0.15</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Tapping, Cutting, and Thread Rolling Machines</td>
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<td>3.15</td>
<td>3.15</td>
<td>-</td>
<td>-</td>
<td>14.37</td>
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<tr>
<td>Oil Quenching</td>
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<td>-</td>
<td>-</td>
<td>0.09</td>
<td>-</td>
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<tr>
<td>Degreaser</td>
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<td>0.28</td>
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<td>Dip Coating Lines</td>
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<td>Welding</td>
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<td>Shot Blasting</td>
<td>51.30</td>
<td>44.12</td>
<td>44.12</td>
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<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Basket washer</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>5.68</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total Excluding Fugitives</strong></td>
<td>54.63</td>
<td>47.69</td>
<td>47.69</td>
<td>0.03</td>
<td>4.33</td>
<td>75.10</td>
<td>3.72</td>
<td>4.90</td>
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<tr>
<td>Fugitives (Paved Roads)</td>
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<td>3.32E-03</td>
<td>8.14E-04</td>
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<td>-</td>
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</tr>
<tr>
<td><strong>Total Including Fugitives</strong></td>
<td>54.65</td>
<td>47.69</td>
<td>47.69</td>
<td>0.03</td>
<td>4.33</td>
<td>75.10</td>
<td>3.72</td>
<td>4.90</td>
</tr>
</tbody>
</table>

* PM2.5 listed is direct PM2.5
### Cold Forming Emissions

**Company Name:** Sunright America, Inc.  
**Source Address:** 6205 S. International Drive, Columbus, IN 47201  
**MSOP Renewal No.:** 005-42152-00110  
**Reviewer:** Michaela Hecox  
**Date:** 12/16/2019

#### Potential to Emit VOCs

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Material</th>
<th>Maximum Material Usage Rate (gal/hr)</th>
<th>Material Usage Rate (gal/yr)</th>
<th>Density (lb/gal)</th>
<th>% Regulated VOC</th>
<th>Uncontrolled PTE of VOCs (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Twenty Eight (28) Nut Forming Machines</td>
<td>M-381-P</td>
<td>0.108</td>
<td>946</td>
<td>7.76</td>
<td>1.42%</td>
<td>0.05</td>
</tr>
<tr>
<td>Twenty Five (25) Nut Forming Machines</td>
<td>MP9280</td>
<td>0.096</td>
<td>845</td>
<td>7.67</td>
<td>3.00%</td>
<td>0.10</td>
</tr>
<tr>
<td>One (1) Nut Forming Machine</td>
<td>Multi-Form 70</td>
<td>0.004</td>
<td>34</td>
<td>7.92</td>
<td>1.56%</td>
<td>2.09E-03</td>
</tr>
<tr>
<td>One (1) Cold Forming Machine</td>
<td>Multi-Form 70</td>
<td>0.004</td>
<td>34</td>
<td>7.92</td>
<td>1.56%</td>
<td>2.09E-03</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>0.15</strong></td>
</tr>
</tbody>
</table>

#### Methodology

Densities and VOC contents for M-381P was provided by the product manufacturer based on Method 24 testing. Density and VOC content for Multi-Form 70 was obtained from the MSDS.

The VOC content of MP9280 was estimated by the manufacturer to be less than 3%. MP9280 has a vapor pressure of <0.1mmHg @ 20°C and a boiling point >250°C.

Material usage rates and throughput information were provided by the source.

The forming machines are constantly flooded with lubricant. Therefore, the particulate emissions are negligible.

Uncontrolled VOC Emissions = Material Usage Rate (gals/yr) * Density (lb/gal) * VOC Content (%) * (1 ton/ 2000 lbs)
Appendix A: Emissions Calculations

Emissions Calculations
Particulate and Hazardous Air Pollutant Emissions (HAPs)

Welding

Company Name: Sunright America, Inc.
Source Address: 6205 S. International Drive, Columbus, IN 47201
MSOP Renewal No.: 005-42152-00110
Reviewer: Michaela Hecox
Date: 12/16/2019

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Max. electrode consumption (lbs/wk)</th>
<th>PM = PM₁₀ + PM₂₅</th>
<th>Mn</th>
<th>Ni</th>
<th>Cr</th>
<th>PM = PM₁₀ + PM₂₅</th>
<th>Mn</th>
<th>Ni</th>
<th>Cr</th>
<th>Emissions (lbs/wk)</th>
<th>HAPS (lbs/wk)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Welding</td>
<td>7.0</td>
<td>0.0055</td>
<td>0.0005</td>
<td>-</td>
<td>-</td>
<td>0.04</td>
<td>0.004</td>
<td>-</td>
<td>-</td>
<td>0.009</td>
<td>0.004</td>
</tr>
<tr>
<td>Electrical Resistance Electrode Spot Welder</td>
<td>5.0</td>
<td>0.0055</td>
<td>0.0005</td>
<td>-</td>
<td>-</td>
<td>0.03</td>
<td>0.003</td>
<td>-</td>
<td>-</td>
<td>0.009</td>
<td>0.003</td>
</tr>
<tr>
<td>QA MIG/TIG Welding</td>
<td>5.0</td>
<td>0.0055</td>
<td>0.0005</td>
<td>-</td>
<td>-</td>
<td>0.03</td>
<td>0.003</td>
<td>-</td>
<td>-</td>
<td>0.009</td>
<td>0.003</td>
</tr>
<tr>
<td>TOTALS</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.09</td>
<td>0.009</td>
</tr>
</tbody>
</table>

METHODOLOGY
Maximum welding electrode consumption is estimated to be 5 pounds per week for maintenance and 5 pounds per week for QA testing.

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Emissions, "tons/yr = emissions, lbs/wk x 52 wks/year x 1 ton/2,000 lbs."
### Emissions Calculations
**Natural Gas-Fired Combustion Equipment**

<table>
<thead>
<tr>
<th>Equipment Name</th>
<th>Unit ID</th>
<th>MMBtu/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fourteen (14) Comfort Heating Units</td>
<td>CH1-CH12, CH13, CH14</td>
<td>5.616</td>
</tr>
<tr>
<td>Quench Furnace</td>
<td>QF1</td>
<td>0.952</td>
</tr>
<tr>
<td>Tempering Furnace</td>
<td>T1</td>
<td>0.950</td>
</tr>
<tr>
<td>Torquer Oven</td>
<td>TO1</td>
<td>0.092</td>
</tr>
<tr>
<td>Endothermic Generator</td>
<td>EG1</td>
<td>0.159</td>
</tr>
<tr>
<td>Two comfort heaters</td>
<td>CH15, CH16</td>
<td>0.500</td>
</tr>
<tr>
<td>Three-zone Geomet coating oven</td>
<td>-</td>
<td>1.567</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>9.86</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PM</strong></td>
<td>1.9</td>
<td>8.04E-02</td>
</tr>
<tr>
<td><strong>PM10</strong></td>
<td>7.6</td>
<td>0.32</td>
</tr>
<tr>
<td><strong>direct PM2.5</strong></td>
<td>7.6</td>
<td>0.32</td>
</tr>
<tr>
<td><strong>SO2</strong></td>
<td>0.6</td>
<td>2.54E-02</td>
</tr>
<tr>
<td><strong>NOx</strong></td>
<td>100.0</td>
<td>4.23</td>
</tr>
<tr>
<td><strong>VOC</strong></td>
<td>5.5</td>
<td>0.23</td>
</tr>
<tr>
<td><strong>CO</strong></td>
<td>84.0</td>
<td>3.56</td>
</tr>
</tbody>
</table>

**Methodology**

All emission factors are based on normal firing.

- **MMBtu** = 1,000,000 Btu
- **MMCF** = 1,000,000 Cubic Feet of Gas

**Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03**

**Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu**

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

**Hazardous Air Pollutants (HAPs)**

<table>
<thead>
<tr>
<th><strong>HAPs - Organics</strong></th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
<td>8.89E-05</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
<td>5.08E-05</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
<td>3.17E-03</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
<td>7.62E-02</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
<td>1.44E-04</td>
</tr>
<tr>
<td><strong>Total - Organics</strong></td>
<td><strong>7.95E-02</strong></td>
<td><strong>2.32E-04</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>HAPs - Metals</strong></th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>5.0E-04</td>
<td>2.12E-05</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
<td>4.66E-05</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
<td>5.93E-05</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.8E-04</td>
<td>1.61E-05</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
<td>8.89E-05</td>
</tr>
<tr>
<td><strong>Total - Metals</strong></td>
<td><strong>2.32E-04</strong></td>
<td><strong>7.95E-02</strong></td>
</tr>
</tbody>
</table>

**Methodology is the same as above.**

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emissions Calculations
Natural Gas-Fired Combustion Only - Burn-Off Oven

Company Name: Sunright America, Inc.
Source Address: 6205 S. International Drive, Columbus, IN 47201
MSOP Renewal No.: 005-42152-00110
Reviewer: Michaela Hecox
Date: 12/16/2019

<table>
<thead>
<tr>
<th>Equipment Name</th>
<th>MMBtu/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Burn-Off Oven</td>
<td>0.238</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>0.238</strong></td>
</tr>
</tbody>
</table>

Heat Input Capacity

<table>
<thead>
<tr>
<th>MMBtu/hr</th>
<th>MMCF</th>
<th>MMCF/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.24</td>
<td></td>
<td>1020</td>
</tr>
<tr>
<td></td>
<td>2.04</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF***</td>
<td>75.0</td>
<td>75.0</td>
<td>75.0</td>
<td>0.6</td>
<td><strong>see below</strong></td>
<td>5.5</td>
<td>84</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>7.67E-02</td>
<td>7.67E-02</td>
<td>7.67E-02</td>
<td>6.13E-04</td>
<td>0.10</td>
<td>5.62E-03</td>
<td>8.58E-02</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 & PM2.5 emission factors are filterable and condensable fractions combined

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
*** Emission factors were taken from permit No. 081-34043-00058, which has a similar bum-off process to Sunright

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>2.15E-06</td>
<td>1.23E-06</td>
<td>7.67E-05</td>
<td>1.84E-03</td>
<td>3.47E-06</td>
<td><strong>1.92E-03</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>5.11E-07</td>
<td>1.12E-06</td>
<td>1.43E-06</td>
<td>3.88E-07</td>
<td>2.15E-06</td>
<td><strong>5.60E-06</strong></td>
</tr>
</tbody>
</table>

Methodology is the same as above

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emissions Calculations
Endothermic Generator Process Emissions

Company Name: Sunright America, Inc.
Source Address: 6205 S. International Drive, Columbus, IN 47201
MSOP Renewal No.: 005-42152-00110
Reviewer: Michaela Hecox
Date: 12/16/2019

<table>
<thead>
<tr>
<th>Unit</th>
<th>Description</th>
<th>Capacity</th>
<th>Natural Gas Consumption¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>EG1</td>
<td>endothermic generator</td>
<td>0.159</td>
<td>1.56E-04</td>
</tr>
</tbody>
</table>

Endothermic gas reaction:²

100 CH₄ + 49 O₂ + 196 N₂ → 98 CO + 196 H₂ + 196 N₂ + 2 CH₄  considers air as 80% N₂ : 20% O₂

100% methane → 98.0% CO + 2.0% CH₄

<table>
<thead>
<tr>
<th>Natural Gas (MMCF/hr)</th>
<th>ft³ CO/hr</th>
<th>lb-mole CO/hr note 3</th>
<th>lb CO/hr</th>
<th>CO PTE (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.56E-04</td>
<td>0.15</td>
<td>4.26E-04</td>
<td>0.02</td>
<td>0.08</td>
</tr>
</tbody>
</table>

Notes:
1. Based on 1,020 MMBtu/MMCF, assuming all natural gas converted to atmosphere gas
3. From the ideal gas law, the molar volume \( \bar{V} = \frac{RT}{p} \). At standard conditions (1 atm, 273 K), \( \bar{V} = \frac{358.7}{\text{ft}^3/\text{lb mole}} \) where the gas law constant, \( R = 1.314 \text{ ft}^3/\text{atm} / \text{lb mole} - \text{K} \), Perry's Chemical Engineers' Handbook, 6th ed., Tbl 1-9

lb-mole CO/hr = \( \frac{\text{ft}^3 \text{ CO/hr}}{\bar{V}} \) (ft³/lb-mole)
Appendix A: Emissions Calculations

Machining Emissions

**Company Name:** Sunright America, Inc.

**Source Address:** 6205 S. International Drive, Columbus, IN 47201

**MSOP Renewal No.:** 005-42152-00110

**Reviewer:** Michaela Hecox

**Date:** 12/16/2019

### Potential to Emit Particulate

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Maximum Throughput Per Unit (parts/hour)</th>
<th>Amount of Material Lost (lbs/part)</th>
<th>Uncontrolled PTE Per Unit (lb/hr)</th>
<th>Uncontrolled PTE of PM/PM10/PM2.5 (tons/year)</th>
<th>Control Efficiency of Electrostatic Precipitator</th>
<th>Controlled PTE of PM/PM10/PM2.5 (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Two (2) Cutters</td>
<td>1000.00</td>
<td>3.60E-04</td>
<td>0.36</td>
<td>3.15</td>
<td>95%</td>
<td>0.16</td>
</tr>
</tbody>
</table>

### Potential to Emit VOCs

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Material</th>
<th>Material Usage Rate (gals/hr)</th>
<th>Density (lb/gal)</th>
<th>% Regulated VOC</th>
<th>Uncontrolled PTE of VOCs (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fifty nine (59) Tapping Machines</td>
<td>CedarCut C-170A</td>
<td>2.50</td>
<td>7.50</td>
<td>16.67%</td>
<td>13.69</td>
</tr>
<tr>
<td>Fifty (50) Tapping Machines</td>
<td>CedarCut C-175F-1</td>
<td>0.42</td>
<td>7.83</td>
<td>3.95%</td>
<td>0.56</td>
</tr>
<tr>
<td>Two (2) Cutters</td>
<td>N/A</td>
<td>0.00</td>
<td>N/A</td>
<td>N/A</td>
<td>0.00</td>
</tr>
<tr>
<td>One (1) Thread Roller</td>
<td>Miller Cool Slide 68 ND</td>
<td>0.13</td>
<td>7.34</td>
<td>3.00%</td>
<td>0.12</td>
</tr>
<tr>
<td><strong>Total (tons/yr)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>14.37</strong></td>
</tr>
</tbody>
</table>

**Methodology**

Densities and VOC contents are obtained from MSDSs and information provided by the manufacturer based on Method 24 testing. The VOC content of Miller Cool Slide 68 ND was estimated by the manufacturer to be less than 3%. Miller Cool Slide 68 ND has a vapor pressure of <0.1mmHg @ 20°C and a boiling point >250°C. These characteristics indicate that Miller Cool Slide 68 ND should not be volatile. However, to be conservative the manufactures estimate Material usage rates are from information provided by the source.

Amount of Material Lost (lbs/part) is based on a mass balance study done by the source.

The tapping and thread rolling machines are constantly flooded with lubricant. Therefore, the particulate emissions are negligible.

Uncontrolled PM/PM10/PM2.5 Per Unit (lb/hr) = Maximum Throughput per unit (parts/hr) * Amount of Material Lost (lbs/part)

Uncontrolled PM/PM10/PM2.5 (ton/year) = Uncontrolled PM/PM10/PM2.5 Per Unit (lb/hr) * 8760 hrs/yr * (1 ton / 2000 lbs) / 2 Units

Controlled PM/PM10/PM2.5 (ton/year) = Uncontrolled PM/PM10/PM2.5 (ton/year) * (1 - Control Efficiency of Electrostatic Precipitator)

Uncontrolled VOC Emissions (tons/yr) = Material Usage Rate (gals/hr) * Density (lb/gal) * VOC Content (%) * 8760 hrs/yr * (1 ton / 2000 lbs)
Appendix A: Emissions Calculations
Oil Quenching

Company Name: Sunright America, Inc.
Source Address: 6205 S. International Drive, Columbus, IN 47201
MSOP Renewal No.: 005-42152-00110
Reviewer: Michaela Hecox
Date: 12/16/2019

<table>
<thead>
<tr>
<th>Maximum Oil Usage (gal/day)*</th>
<th>Density (lbs/gal)**</th>
<th>Evaporative Loss (%)</th>
<th>VOC Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.6648</td>
<td>7.09</td>
<td>2.00%</td>
<td>0.09</td>
</tr>
</tbody>
</table>

* Based on volume of make-up oil added, assuming continuous operation and maximum production rate.
** Based on Material Safety Data Sheet for CITGO Quench Oil 521

Methodology
Loss rate is a conservative estimate. The only expected loss will be the oil carried out on parts.
Potential VOC Emissions (tons/year) = Maximum Oil Usage (gal/day) * Density (lbs/gal) * (365 days / 1 year) * (1 ton / 2,000 lbs) * Evaporative Loss (%)
Appendix A: Emissions Calculations
Parts Washers
VOC and HAP Emission Calculations

Company Name: Sunright America, Inc.
Source Address: 6205 S. International Drive, Columbus, IN 47201
MSOP Renewal No.: 005-42152-00110
Reviewer: Michaela Hecox
Date: 12/16/2019

Parts Washer (Tool Room)

Maximum annual solvent usage: 84.23 gallons
Solvent density: 6.70 lbs/gallon
Percent Volatile: 100%
Percent HAPs: No HAPs

VOC Emissions (tons/year) = Max usage (gal/year) x density (lbs/gal) x percent volatile (%) x 1ton/2000lbs

\[ \text{VOC Emissions (tons/year)} = 0.28 \]
Appendix A: Emissions Calculations
Fastener Coating Operations

Company Name: Sunright America, Inc.
Source Address: 6205 S. International Drive, Columbus, IN 47201
MSOP Renewal No.: 005-42152-00110
Reviewer: Michaela Hecox
Date: 12/16/2019

1. VOC

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Gal of Mat. (gal/hr)</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Torquer CAH Green</td>
<td>8.48</td>
<td>98.73%</td>
<td>90.3%</td>
<td>8.5%</td>
<td>3.75000</td>
<td>0.72</td>
<td>2.69</td>
<td>64.68</td>
<td>11.80</td>
</tr>
<tr>
<td>Geomet 720LS</td>
<td>11.40</td>
<td>59.50</td>
<td>33.40</td>
<td>26.10</td>
<td>1.93</td>
<td>2.98</td>
<td>5.74</td>
<td>137.82</td>
<td>25.15</td>
</tr>
<tr>
<td>Myucon (u-Con Type L)</td>
<td>8.35</td>
<td>100.00</td>
<td>80.10</td>
<td>19.90</td>
<td>2.38</td>
<td>1.66</td>
<td>3.95</td>
<td>94.91</td>
<td>17.32</td>
</tr>
</tbody>
</table>

State Potential Emissions

|                        | 12.39 | 297.41 | 54.28 |

METHODOLOGY
The Torquer Coating is diluted with water prior to application. The calculations above utilize the as-applied coating composition, after dilution. The mix ratio is: 1.532 gallons of coating and 2.166 gallons of water. This is a dip coating operation. Therefore, it does not generate any particulate emissions.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Worst Solvent

2. Hazardous Air Pollutants

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Coating Material (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Lbs Methanol/gal coating (Lbs/Gal)</th>
<th>PTE Methanol (Lbs/hr)</th>
<th>PTE Methanol (Lbs/day)</th>
<th>PTE Methanol (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Geomet 720LS</td>
<td>11.40</td>
<td>1.93</td>
<td>1.00</td>
<td>5.00</td>
<td>0.57</td>
<td>1.10</td>
<td>26.40</td>
</tr>
</tbody>
</table>

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
According to the SDSs provided by Sunright, Methanol is present in Geomet 720LS coating at <5%.
According to the SDSs provided by Sunright, u-Con Type L coating does not contain HAPs.
## Appendix A: Emissions Calculations

### Maintenance Metalworking

**Company Name:** Sunright America, Inc.  
**Source Address:** 6205 S. International Drive, Columbus, IN 47201  
**MSOP Renewal No.:** 005-42152-00110  
**Reviewer:** Michaela Hecox  
**Date:** 12/16/2019

### Potential to Emit

<table>
<thead>
<tr>
<th>Particulates</th>
<th>Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM/PM(<em>{10})/PM(</em>{2.5}) lost (tons/year)</td>
<td>0.02</td>
</tr>
</tbody>
</table>

### Methodology

Metalworking operations are infrequent and are for maintenance purposes only. Maximum throughput rate is estimated to be 5 pounds per hour. Fraction PM lost value based on a conservative estimate of material lost in the process.

\[
PTE \ PM/PM_{10}/PM_{2.5} (\text{tons/year}) = \text{Max. Throughput Rate (tons/hour)} \times \text{Fraction lost} \times 8760 \text{ hours/year}
\]

<table>
<thead>
<tr>
<th>Process</th>
<th>Max Throughput Rate*</th>
<th>Fraction of PM/PM(<em>{10})/PM(</em>{2.5}) lost</th>
<th>Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintenance Metalworking</td>
<td>5.00</td>
<td>0.0025</td>
<td>0.02</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>5.00</strong></td>
<td><strong>0.0025</strong></td>
<td><strong>0.02</strong></td>
</tr>
</tbody>
</table>
Appendix A: Emission Calculations

Abrasives Blasting - Confined

Company Name: Sunright America, Inc.
Source Address: 6205 S. International Drive, Columbus, IN 47201
MSOP Renewal No.: 005-42152-00110
Reviewer: Michaela Hecox
Date: 12/16/2019

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td></td>
</tr>
</tbody>
</table>

Table 2 - Density of Abrasives (lb/ft³)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al oxides</td>
<td>160</td>
</tr>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
</tr>
</tbody>
</table>

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

<table>
<thead>
<tr>
<th>Nozzle Type (diameter)</th>
<th>Internal diameter, in</th>
<th>30</th>
<th>40</th>
<th>50</th>
<th>60</th>
<th>70</th>
<th>80</th>
<th>90</th>
<th>100</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. 2 (7/8 inch)</td>
<td>0.125</td>
<td>28</td>
<td>35</td>
<td>42</td>
<td>49</td>
<td>56</td>
<td>63</td>
<td>70</td>
<td>77</td>
</tr>
<tr>
<td>No. 3 (3/16 inch)</td>
<td>0.1975</td>
<td>65</td>
<td>80</td>
<td>94</td>
<td>107</td>
<td>122</td>
<td>135</td>
<td>149</td>
<td>165</td>
</tr>
<tr>
<td>No. 4 (1/4 inch)</td>
<td>0.25</td>
<td>109</td>
<td>138</td>
<td>168</td>
<td>195</td>
<td>221</td>
<td>255</td>
<td>280</td>
<td>309</td>
</tr>
<tr>
<td>No. 5 (5/16 inch)</td>
<td>0.3125</td>
<td>206</td>
<td>247</td>
<td>292</td>
<td>354</td>
<td>377</td>
<td>420</td>
<td>462</td>
<td>507</td>
</tr>
<tr>
<td>No. 6 (3/8 inch)</td>
<td>0.375</td>
<td>285</td>
<td>355</td>
<td>417</td>
<td>477</td>
<td>540</td>
<td>600</td>
<td>657</td>
<td>720</td>
</tr>
<tr>
<td>No. 7 (7/16 inch)</td>
<td>0.4375</td>
<td>385</td>
<td>472</td>
<td>560</td>
<td>645</td>
<td>755</td>
<td>820</td>
<td>905</td>
<td>940</td>
</tr>
<tr>
<td>No. 8 (1/2 inch)</td>
<td>0.5</td>
<td>500</td>
<td>615</td>
<td>725</td>
<td>835</td>
<td>945</td>
<td>1050</td>
<td>1160</td>
<td>1265</td>
</tr>
<tr>
<td>No. 10 (5/8 inch)</td>
<td>0.625</td>
<td>625</td>
<td>750</td>
<td>920</td>
<td>1100</td>
<td>1330</td>
<td>1510</td>
<td>1680</td>
<td>2030</td>
</tr>
<tr>
<td>No. 12 (3/4 inch)</td>
<td>0.75</td>
<td>1140</td>
<td>1420</td>
<td>1670</td>
<td>1915</td>
<td>2160</td>
<td>2400</td>
<td>2630</td>
<td>2880</td>
</tr>
<tr>
<td>No. 16 (1 inch)</td>
<td>1</td>
<td>2030</td>
<td>2460</td>
<td>2900</td>
<td>3340</td>
<td>3780</td>
<td>4200</td>
<td>4640</td>
<td>5060</td>
</tr>
</tbody>
</table>

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)

Potential to Emit Before Control

Emission Control Device Efficiency  = 90.0%
Potential to Emit (after control)  = [Potential to Emit (before control)] * [1 - control efficiency]
Potential to Emit (tons/yr)       = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

METHODOLOGY

PM2.5 emissions assumed equal to PM10 emissions.
Appendix A: Emission Calculations
Basket Washer

Company Name: Sunright America, Inc.
Source Address: 6205 S. International Drive, Columbus, IN 47201
MSOP Renewal No.: 005-42152-00110
Reviewer: Michaela Hecox
Date: 12/16/2019

<table>
<thead>
<tr>
<th>Material</th>
<th>Usage (gal/unit)</th>
<th>Throughput (unit/hr)</th>
<th>Product Concentration (% by volume)</th>
<th>VOC Content (g/l)</th>
<th>Potential to Emit VOC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metalnox M6324CP</td>
<td>90</td>
<td>4</td>
<td>8%</td>
<td>5.4</td>
<td>1.30</td>
</tr>
</tbody>
</table>

Methodology
Unit of measure is one (1) basket
Product concentration and VOC content provided by the supplier, SDS dated 8/27/2015 and product bulletin © 2017

Potential to Emit (lb/hr) = Usage (gal/unit) x Throughput (unit/hr) x Product Concentration (% by volume)/100 x VOC Content (g/l) x 0.0022046 (lb/g) x 3.785 (l/gal)
PTE (lb/day) = PTE (lb/hr) x 24 (hr/day)
PTE (tons/yr) = PTE (lb/hr) x 8,760 (hr/yr) / 2,000 (lb/ton)
Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Sunright America, Inc.
Source Address: 6205 S. International Drive, Columbus, IN 47201
MSOP Renewal No.: 005-42152-00110
Reviewer: Michaela Hecox
Date: 12/16/2019

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (ft/mile)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way distance (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>2000</td>
<td>0.379</td>
<td>3.8</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>2000</td>
<td>0.379</td>
<td>3.8</td>
</tr>
<tr>
<td>Totals</td>
<td>20.0</td>
<td>20.0</td>
<td>7.6</td>
<td>7.6</td>
<td>2765.2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = 1.0 tons/trip
Average Miles Per Trip = 0.38 miles/trip

Unmitigated Emission Factor, $E_f = \left( k \cdot (sL)^{0.91} \cdot (W)^{1.02}\right)$  

where $k = 0.011$  
$W = 1.0$ tons  
$sL = 1.1$ g/m$^2$  

and $PM = \frac{PM_{10}}{0.00054}$  
$PM_{10} = 1.0$ tons  

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E \cdot \left[ 1 - \left( \frac{p}{4N} \right) \right]$  

where $p = 125$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
$N = 365$ days per year

Unmitigated Emission Factor, $E_f = 0.012$  
Mitigated Emission Factor, $E_{ext} = 0.011$  

Process | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM (tons/yr) |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>0.01</td>
<td>1.66E-03</td>
<td>4.07E-04</td>
<td>0.01</td>
<td>1.52E-03</td>
<td>3.72E-04</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>0.01</td>
<td>1.66E-03</td>
<td>4.07E-04</td>
<td>0.01</td>
<td>1.52E-03</td>
<td>3.72E-04</td>
</tr>
<tr>
<td>Totals</td>
<td>0.02</td>
<td>3.32E-03</td>
<td>8.14E-04</td>
<td>0.02</td>
<td>3.03E-03</td>
<td></td>
</tr>
</tbody>
</table>

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]

Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit
January 14, 2020

Mr. Greg Brown
Sunright America
6205 South International Drive
Columbus, Indiana  47201

Re:  Public Notice
Sunright America
Permit Level:  MSOP Renewal
Permit Number: 005-42152-00110

Dear Mr. Brown:

Enclosed is a copy of your draft MSOP Renewal, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here:  https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Bartholomew County Public Library, 536 5th Street in Columbus, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Ms. Michaela Hecox, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-3031 or dial (317) 233-3031.

Sincerely,

John F. Jackson
Permits Branch
Office of Air Quality
January 14, 2020

To: Bartholomew County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Sunright America
Permit Number: 005-42152-00110

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.
Notice of Public Comment

January 14, 2020
Sunright America
005-42152-00110

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter  4/12/2019
# Mail Code 61-53

**FACSIMILE OF PS Form 3877**  
Mail Code 61-53  
IDEF Staff JJACKSON 1/14/2020  
Sunright America 005-42152-00110 (DRAFT)  
**IDEM Staff**

**Name and address of Sender**

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<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
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<tbody>
<tr>
<td>1</td>
<td></td>
<td>Greg Brown, Sunright America, 6205 S International Dr, Columbus IN 47201 (Source: CAATS)</td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Kei Nomura, Vice President, Sunright America, 6205 S International Dr, Columbus IN 47201 (RO: CAATS)</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>Columbus City Council and Mayor's Office, 123 Washington St, Columbus IN 47201 (Local Official)</td>
</tr>
<tr>
<td>4</td>
<td></td>
<td>Mr. Lcnfo, 1039 Sycamore St, Columbus IN 47201 (Affected Party)</td>
</tr>
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<td>5</td>
<td></td>
<td>Bartholomew County Public Library, 536 Fifth St., Columbus IN 47201-6225 (Library)</td>
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<tr>
<td>6</td>
<td></td>
<td>Bartholomew County Commissioners, 440 Third Street, Columbus IN 47202 (Local Official)</td>
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<td>7</td>
<td></td>
<td>Mr. Jean Terpstra, 30225 Adams Ln, Westlake OH 44145 (Affected Party)</td>
</tr>
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<td>8</td>
<td></td>
<td>Terry Lowe, 450 Hurricane St, Franklin IN 46131 (Affected Party)</td>
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<td>9</td>
<td></td>
<td>Mr. Charles Mitch, 30225 Adams Ln, Westlake OH 44145 (Affected Party)</td>
</tr>
<tr>
<td>10</td>
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<td>Bartholomew County Health Department, 440 3rd Street, Suite 303, Columbus IN 47201 (Health Department)</td>
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<tr>
<td>11</td>
<td></td>
<td>Kenneth K Arnholt Trust, Berneice M Arnholt, 2850 N, Indianapolis Rd, Columbus IN 47201 (Affected Party)</td>
</tr>
<tr>
<td>12</td>
<td></td>
<td>Kevin Green, Greensburg Daily News, 135 S Franklin St, Greensburg IN 47240 (Affected Party)</td>
</tr>
<tr>
<td>13</td>
<td></td>
<td>Mr. Travis Bennett, August Mack Environmental, Inc., 1302 North Meridian Street, Suite 300, Indianapolis IN 46202 (Consultant)</td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td></td>
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**Type of Mail:** CERTIFICATE OF MAILING ONLY

**Remarks**

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<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
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**Total number of pieces Listed by Sender**

**Total number of Pieces Received at Post Office**

**Postmaster, Per (Name of Receiving employee)**

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See **Domestic Mail Manual** R900, S913, and S921 for limitations of coverage on insured and COD mail. See **International Mail Manual** for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.