NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and Federally Enforceable State Operating Permit (FESOP)

for LH Medical in Allen County

FESOP No.: F003-42169-00395

The Indiana Department of Environmental Management (IDEM) has received an application from LH Medical, located at 6932 Gettysburg Pike Fort Wayne IN, 46804, for a new source review and FESOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow LH Medical to make certain changes at its existing source and to continue to operate its existing source. LH Medical has applied to add emission units.

The applicant has constructed and operated new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, 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). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the two (2) tool grinders (Makino & Scripta) and the four (4) Abrasive Blasters have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Allen County Public Library
5630 Coventry Lane
Fort Wayne, IN 46804

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 M003-42169-00395 in all correspondence.

Comments should be sent to:

Shelby O’Neal
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6097, ask for Shelby O’Neal or (317) 233-8578
Or dial directly: (317) 233-8578
Fax: (317) 232-6749 attn: Shelby O’Neal
E-mail: SOneal@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/2355.htm; and the Citizens’ Guide to IDEM on the Internet at: 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, 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 Shelby O’Neal of my staff at the above address.

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality
New Source Review and Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

LH Medical
6932 Gettysburg Pike
Fort Wayne, Indiana 46804

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

<table>
<thead>
<tr>
<th>Operation Permit No.: F003-42169-00395</th>
</tr>
</thead>
<tbody>
<tr>
<td>Master Agency Interest ID: 947</td>
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</tbody>
</table>

Issued by: Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

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<thead>
<tr>
<th>Issuance Date:</th>
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SECTION A  SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary stainless steel medical part manufacturing.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>6932 Gettysburg Pike, Fort Wayne, Indiana 46804</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>260-432-5563</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3471 (Electroplating, Plating, Polishing, Anodizing, and Coloring)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Allen</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

A.2  Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(a) Eleven (11) abrasive bead blasters, each with a maximum material throughput of 80 lb/hr, each with a maximum abrasive usage rate of 315.15 lb/hr, each using a dust collector for particulate control and exhausting into the building, consisting of the following units:

1. One (1) Trinco 36X36/IELUXE, constructed in 2011
2. Five (5) Trinco 136x36/IELUXW, constructed in 2013 and 2019
3. One (1) Infablast MFI-3624, constructed in 2011
4. Two (2) Empire DCM-80A, constructed in 2011 and 2012
5. One (1) Empire PF2636, constructed in 2011
6. One (1) Empire Microjet MJ-7, constructed in 2016

(b) Two (2) stainless steel passivation tanks with a citric acid bath, identified as EU-01 and EU-05, constructed in 2014 and in 2017, each with a maximum capacity of 80 lb/hr of stainless steel, using no control and exhausting to stack S-01.

(c) One (1) Full Finishing Area for polishing of various stainless steels, identified as EU-04, constructed in 2011 and modified in 2014 and 2015, each with a maximum throughput of 80 lb/hr, using a Torit dust collector for particulate control and exhausting into the building, consisting of the nine (9) grinders:

1. Two (2) Hammond 7-VRRO-B grinders, constructed in 2011
2. Two (2) Hammond VRRO grinders, constructed in 2011
3. One (1) Reliable B 368 grinder, constructed in 2011
4. One (1) Balvor 08J7 grinder, constructed in 2011
5. Two (2) Dynabrade 17407.00 grinder, constructed in 2011 and 2015
6. One (1) Hammond VRO grinder, constructed in 2014
(d) One (1) machining operation, identified as EU-03, constructed in 2011, each with a maximum throughput of 80 lb/hr, using no controls and exhausting into the building, consisting of the following units:

(1) Nine (9) Mori Selki high speed 5 Axis Vertical Mills (wet), constructed in 2011
(2) Four (4) Mori Selki Mill Turn Lathes (wet), three (3) constructed in 2011 and one (1) constructed in 2017
(3) One (1) Nakamura Lathe (wet), constructed in 2014
(4) One (1) Nakamura-Toma WY-100 Lathe (wet), constructed in 2018
(5) Sixteen (16) Haas Mill (wet), three (3) constructed in 2011, four (4) constructed in 2012, two (2) constructed in 2018, and seven (7) constructed in 2019
(6) Two (2) Star ECAS32T Swiss Lathes (wet), constructed in 2018
(7) Two (2) Fanuc Wire EDM A1iD with rotary (wet), constructed in 2011
(8) One (1) Fanuc Wire EDM A1iD2 with rotary (wet), constructed in 2016
(9) One (1) Fanuc Wire RAM with rotary (wet), constructed in 2016
(10) One (1) Bridgeport Mill (wet), constructed in 2011
(11) One (1) Mitsui Surface Grinder (dry), constructed in 2011
(12) One (1) Diato Horizontal Band Saw (dry), constructed in 2011
(13) One (1) Profiler Plastic Shaper (dry), constructed in 2011
(14) One (1) Standard Lathe
(15) Seven (7) Swiss Lathes, three (3) constructed in 2011, one (1) constructed in 2013, two (2) constructed in 2015, and one (1) constructed in 2020
(16) Two (2) Tool Grinders (Makino & Scripta)
(17) Ten (10) Charmilles Wire EDM (wet), five (5) constructed in 2018 and five (5) constructed in 2019
(18) Four (4) Matsuura Mills, three constructed in 2018 and one (1) constructed in 2019

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
This stationary source also includes the following insignificant activities:

(a) Two (2) natural gas fired space heaters, each with a maximum heat input capacity of 1.6 MMBtu/hr.
(b) One (1) Portable Pressurized Acetylene Storage Tank, with a throughput of 2 tanks/month.
(c) Sixteen (16) 55-Gallon Storage Drums Containing Maintenance Raw Materials, with a throughput of 3 drums/month.
(d) Three (3) Stationary Closed, Non-Vented Tumbler Used for Cleaning or Deburring Metal Products without Abrasive Blasting, each with a throughput of 3 totes/month.
(e) Four (4) Pencil Grinders, constructed in 2009, used daily in metal finishing
(f) Four (4) 55-Gallon Vessel Storing Machining Fluid, each with a throughput of 3 drums/month.
(g) Paved Roads

A.4 FESOP Applicability [326 IAC 2-8-2]
This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).
SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F003-42169-00395, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, 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 [326 IAC 2-8-6] [IC 13-17-12]

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 [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) If required by specific condition(s) in Section D of this permit, 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:

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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(b) 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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) 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.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

   Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865

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

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

   within two (2) working days of the time when emission limitations were exceeded due to the emergency.

   The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

   (A) A description of the emergency;
   (B) Any steps taken to mitigate the emissions; and
   (C) Corrective actions taken.

   The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

   (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

   (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F003-42169-00395 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee’s right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) Emission Trades [326 IAC 2-8-15(b)]

The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [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.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source’s potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source’s potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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:

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
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.

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. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) 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).

(g) 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.

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

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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(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.
The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(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. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
(b) The address for report submittal is:

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) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.

**Stratospheric Ozone Protection**

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
Emission Unit Description:

(a) Eleven (11) abrasive bead blasters, each with a maximum material throughput of 80 lb/hr, each with a maximum abrasive usage rate of 315.15 lb/hr, each using a dust collector for particulate control and exhausting into the building, consisting of the following units:

1. One (1) Trinco 36X36/IELUXE, constructed in 2011
2. Five (5) Trinco 136x36/IELUXW, constructed in 2013 and 2019
3. One (1) Infablast MFI-3624, constructed in 2011
4. Two (2) Empire DCM-80A, constructed in 2011 and 2012
5. One (1) Empire PF2636, constructed in 2011
6. One (1) Empire Microjet MJ-7, constructed in 2016

(b) One (1) Full Finishing Area for polishing of various stainless steels, identified as EU-04, constructed in 2011 and modified in 2014 and 2015, each with a maximum throughput of 80 lb/hr, using a Torit dust collector for particulate control and exhausting into the building, consisting of the nine (9) grinders:

1. Two (2) Hammond 7-VRRO-B grinders, constructed in 2011
2. Two (2) Hammond VRRO grinders, constructed in 2011
3. One (1) Reliable B 368 grinder, constructed in 2011
4. One (1) Balvor 08J7 grinder, constructed in 2011
5. Two (2) Dynabrade 17407.00 grinder, constructed in 2011 and 2015
6. One (1) Hammond VRO grinder, constructed in 2014

(d) One (1) machining operation, identified as EU-03, constructed in 2011, each with a maximum throughput of 80 lb/hr, using no controls and exhausting into the building, consisting of the following units:

1. Nine (9) Mori Selki high speed 5 Axis Vertical Mills (wet), constructed in 2011
2. Four (4) Mori Selki Mill Turn Lathes (wet), three (3) constructed in 2011 and one (1) constructed in 2017
3. One (1) Nakamura Lathe (wet), constructed in 2014
4. One (1) Nakamura-Toma WY-100 Lathe (wet), constructed in 2018
5. Sixteen (16) Haas Mill (wet), three (3) constructed in 2011, four (4) constructed in 2012, two (2) constructed in 2018, and seven (7) constructed in 2019
6. Two (2) Star ECAS32T Swiss Lathes (wet), constructed in 2018
7. Two (2) Fanuc Wire EDM A1iD with rotary (wet), constructed in 2011
8. One (1) Fanuc Wire EDM A1iD2 with rotary (wet), constructed in 2016
9. One (1) Fanuc Wire RAM with rotary (wet), constructed in 2016
10. One (1) Bridgeport Mill (wet), constructed in 2011
11. One (1) Mitsui Surface Grinder (dry), constructed in 2011
12. One (1) Diato Horizontal Band Saw (dry), constructed in 2011
13. One (1) Profiler Plastic Shaper (dry), constructed in 2011
14. One (1) Standard Lathe
15. Seven (7) Swiss Lathes, three (3) constructed in 2011, one (1) constructed in 2013, two (2) constructed in 2015, and one (1) constructed in 2020
16. Two (2) Tool Grinders (Makino & Scripta)
17. Ten (10) Charmilles Wire EDM (wet), five (5) constructed in 2018 and five (5)
constructed in 2019
(18) Four (4) Matsuura Mills, three constructed in 2018 and one (1) constructed in 2019

(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 2-8-4(1)]

D.1.1 FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) the Permittee shall comply with the following:

<table>
<thead>
<tr>
<th>Unit</th>
<th>PM10 Emission Limit (lb/hr)</th>
<th>PM2.5 Emission Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Infrablast MFI-3624</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire Microjet MJ-J</td>
<td>0.95</td>
<td>0.95</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than one-hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 FESOP Limits [326 IAC 2-8-4][326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable, the Permittee shall comply with the following:

<table>
<thead>
<tr>
<th>Unit</th>
<th>Chromium (lb/hr)</th>
<th>Nickel (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full Finishing Area - Polishing</td>
<td>1.44</td>
<td>1.52</td>
</tr>
</tbody>
</table>

Compliance with this limit, combined with the potential to emit HAPs from all other emission units at the source, shall limit the source-wide potential to emit any single HAP to less than 10 tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326IAC 2-7 (Part 70 Permits) not applicable.

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the emission units comprising the abrasive blasting operation shall not exceed the limits shown below. The pound per hour limitation was calculated with the following equation:

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

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

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>
</tr>
</thead>
<tbody>
<tr>
<td>Trinco 136X36/IELUXE</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
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<td>1.38</td>
</tr>
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<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
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<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
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<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire PF2636</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire Microjet MJ-J</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>Full Finishing Area for polishing</td>
<td>0.36</td>
<td>2.06</td>
</tr>
<tr>
<td>Combined Machining operations</td>
<td>2.64</td>
<td>7.86</td>
</tr>
</tbody>
</table>

**D.1.4 Preventative Maintenance Plan [326 IAC 1-6-3]**

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B-Preventive Maintenance Plan contains the Permittee’s obligation with regard to Preventive Maintenance Plans.

**Compliance Determination Requirements [326 IAC 2-8-4(1)]**

**D.1.5 Particulate Controls**

In order to assure compliance with Condition D.1.3, the baghouses for particulate control shall be in operation and control emissions from the abrasive blasting operations and the full finishing area for polishing facility at all times the abrasive blasting operations and full finishing area for polishing are in operation.

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

**D.1.6 Parametric Monitoring**

The Permittee shall monitor and record the pressure drop across the Torit dust collector controlling the full finishing area for polishing, at least once per day, when the full finishing area for polishing is in operation. When for any one reading, the pressure drop across the Torit dust collector is outside the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between of 0.1 and 0.3 inches of water unless a different upper-bound or lower-bound value for these ranges is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.7 Dust Collector Inspections

The Permittee shall perform semi-annual inspections of the dust collectors controlling particulate from the abrasive bead blasters to verify that they are 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 units shall be replaced.

D.1.8 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions and Exceedances).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions and Exceedances).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.9 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.6, the Permittee shall maintain a daily record of the pressure drop across the Torit dust collector controlling the full finishing area for polishing. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6.

(c) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.
Source Name: LH Medical
Source Address: 6932 Gettysburg Pike, Fort Wayne, Indiana 46804
FESOP Permit No.: F003-42169-00395

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- [ ] Annual Compliance Certification Letter
- [ ] Test Result (specify) ________________________________
- [ ] Report (specify) ________________________________
- [ ] Notification (specify) ________________________________
- [ ] Affidavit (specify) ________________________________
- [ ] Other (specify) ________________________________

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: ________________________________
Printed Name: ________________________________
Title/Position: ________________________________
Date: ________________________________
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: LH Medical
Source Address: 6932 Gettysburg Pike, Fort Wayne, Indiana 46804
FESOP Permit No.: F003-42169-00395

This form consists of 2 pages
Page 1 of 2

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  • The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business
    hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  • The Permittee must submit notice in writing or by facsimile within two (2) working days
    (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NO₃, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
<tr>
<td>If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:</td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: LH Medical  
Source Address: 6932 Gettysburg Pike, Fort Wayne, Indiana 46804  
FESOP Permit No.: F003-42169-00395  

Months: __________ to __________ Year: ____________

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
<th>Number of Deviations</th>
<th>Probable Cause of Deviation</th>
<th>Response Steps Taken</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>

Permit Requirement (specify permit condition #)

Date of Deviation: 
Duration of Deviation: 
Number of Deviations: 
Probable Cause of Deviation: 
Response Steps Taken: 

Permit Requirement (specify permit condition #)

Date of Deviation: 
Duration of Deviation: 
Number of Deviations: 
Probable Cause of Deviation: 
Response Steps Taken: 

Page 1 of 2
<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
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<tr>
<td>Permit Requirement (specify permit condition #)</td>
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<tr>
<td>Date of Deviation:</td>
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<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: _______________________________________________________
Title / Position: ___________________________________________________________
Date: ___________________________________________________________________
Phone: _________________________________________________________________
Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>LH Medical</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>6932 Gettysburg Pike, Fort Wayne, IN 46804</td>
</tr>
<tr>
<td>County:</td>
<td>Allen</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3471 (Electroplating, Plating, Polishing, Anodizing, and Coloring)</td>
</tr>
<tr>
<td>Permit No.:</td>
<td>F003-42169-00395</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Shelby O’Neal</td>
</tr>
</tbody>
</table>

On November 6, 2019, the Office of Air Quality (OAQ) received an application from LH Medical related to the construction and operation of new emission units at an existing stationary stainless steel medical part manufacturing source and transition from a MSOP to a FESOP.

Existing Approvals

The source has been operating under MSOP No.: 003-34781-00395, issued on October 24, 2014. There have been no subsequent approvals issued.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in Allen 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 July 20, 2012, for the 2008 8-hour ozone standard.¹</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>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) 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 NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(b) **PM$_{2.5}$**

Allen 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**

Allen 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.

### Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) Seven (7) abrasive bead blasters, each with a maximum material throughput of 80 lb/hr, each with a maximum abrasive usage rate of 315.15 lb/hr, each using a dust collector for particulate control and exhausting into the building, consisting of the following units:

1. One (1) Trinco 36X36/IELUXE, constructed in 2011
2. Three (3) Trinco 136x36/IELUXW, constructed in 2013
3. One (1) Infablast MFI-3624, constructed in 2011
4. One (1) Empire DCM-80A, constructed in 2011
5. One (1) Empire PF2636, constructed in 2011

(b) One (1) stainless steel passivation tanks with a citric acid bath, identified as EU-01, constructed in 2014, with a maximum capacity of 80 lb/hr of stainless steel, using no control and exhausting to stack S-01.
(c) One (1) Full Finishing Area for polishing of various stainless steels, identified as EU-04, constructed in 2011, each with a maximum throughput of 80 lb/hr, using a Torit dust collector for particulate control and exhausting into the building, consisting of the seven (7) grinders:

1. Two (2) Hammond 7-VRRO-B grinders, constructed in 2011
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6. One (1) Fanuc Wire EDM A1iD2 with rotary (wet), constructed in 2016
7. One (1) Bridgeport Mill (wet), constructed in 2011
8. One (1) Mitsui Surface Grinder (dry), constructed in 2011
9. One (1) Diato Horizontal Band Saw (dry), constructed in 2011
10. One (1) Profiler Plastic Shaper (dry), constructed in 2011

(e) Two (2) natural gas-fired space heaters, each with a maximum heat input capacity of 1.6 MMBtu/hr.

(f) Paved Roads

### Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

(d) One (1) machining operation, identified as EU-03, constructed in 2011, each with a maximum throughput of 80 lb/hr, using no controls and exhausting into the building, consisting of the following units:

1. Three (3) Sodick Wire EDM aQ537L with rotary (wet)
2. One (1) Citizen L16 Swiss Lathes (wet), constructed in 2011
3. Three (3) Sodick Wire EDM aQ537L with rotary (wet)
4. One (1) Mill (wet)

### Emission Units and Pollution Control Equipment Constructed Under the Provisions of 326 IAC 2-1.1-3 (Exemptions)

As part of this permitting action, the source requested to add the following existing emission unit(s) constructed under the provisions of 326 IAC 2-1.1-3 (Exemptions):

#### 2011

(a) Two (2) Haas Mills (wet), constructed in 2011

(b) One (1) Standard Lathe, constructed in 2011

(c) Three (3) Swiss Lathes, constructed in 2011
2012
(a) Four (4) Haas Mills (wet), constructed in 2012

2013
(a) One (1) Swiss Lathe, one (1) constructed in 2013

2014
(a) One (1) Nakamura Lathe (wet), constructed in 2014
(b) One (1) Hammond grinder for the Full Finishing Area - Polishing, constructed in 2014

2015
(a) Two (2) Swiss Lathes, constructed in 2015
(b) One (1) Dynabrade 17407.00 grinder for the Full Finishing Area - Polishing, constructed in 2015

2016
(a) One (1) Fanuc Wire RAM with rotary (wet), constructed in 2016

2017
(a) One (1) stainless steel passivation tank, identified as EU-05, constructed in 2017, with a maximum throughput of 80 lb/hr, using no control and exhausting into the building
(b) One (1) Mori Selki Mill Turn Lathe (wet), constructed in 2017

2018
(a) One (1) Nakamura-Toma WY-100 Lathe (wet), constructed in 2018
(b) Two (2) Haas Mills (wet), constructed in 2018
(c) Five (5) Charmilles Wire EDM (wet), constructed in 2018
(d) Three (3) Matsuura Mills, constructed in 2018

2019
(a) Seven (7) Haas Mills (wet), constructed in 2019
(b) Five (5) Charmilles Wire EDM (wet), constructed in 2019
(c) One (1) Matsuura Mills, constructed in 2019

2020
(a) One (1) Swiss Lathe, constructed in 2020

Other
(g) One (1) Portable Pressurized Acetylene Storage Tank, with a throughput of 2 tanks/month.
(h) Sixteen (16) 55-Gallon Storage Drums Containing Maintenance Raw Materials, with a throughput of 2 drums/month.
Three (3) Stationary Closed, Non-Vented Tumbler Used for Cleaning or Deburring Metal Products without Abrasive Blasting, identified as 17-310-725-01, with a throughput of 3 totes/month.

Four (4) Pencil Grinders, constructed in 2009, used daily in metal finishing

Four (4) 55-Gallon Vessel Storing Machining Fluid, with a throughput of 3 drums/month.

The emission units are identified under 326 IAC 2-1.1-3(e)(2)-(46) (Exemptions) and the addition of the emission units did not require the source to transition to a higher operation permit level. Therefore, pursuant to 326 IAC 2-1.1-3(e), the permit revision requirements under 326 IAC 2-6.1-6, including the requirement to submit an application, do not apply to the emission unit(s). See Appendix A of this Technical Support Document for detailed emission calculations.

Description of Proposed Revision to an Existing Source

The Office of Air Quality (OAQ) has reviewed an application, submitted by LH Medical on November 6, 2019, relating to the addition of emission units.

The following emission units were constructed and/or operated without a permit:

2011

(a) Two (2) Tool Grinders (Makino & Scripta), identified as 17-310-820-05 and 17-310-820-06, constructed in 2011, each with a maximum throughput of 80 lb/hr, each using no controls and exhausting into the building.

2012

(a) One (1) Empire DCM-80A abrasive blaster, constructed in 2012, with a maximum throughput of 80 lb/hr and a maximum abrasive usage rate of 315.15 lb/hr, using a dust collector for particulate control, and exhausting into the building.

2016

(a) One (1) Empire Microjet MJ-7 mini blaster, constructed in 2016, with a maximum throughput of 80 lb/hr and a maximum abrasive usage rate of 315.15 lb/hr, using a dust collector for particulate control, and exhausting into the building.

2019

(a) Two (2) Trinco 136x36/IELUXW bead blasters, each with a combined maximum material throughput of 80lb/hr, each with an abrasive usage rate of 315.15 lb/hr, each using a dust collector for particulate control and exhausting into the building.

Enforcement Issue

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

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.
Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. 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.

### 2011

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM₁₀</th>
<th>PM₂.₅¹</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP² (Chromium)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinders (Makino &amp; Scripta)</td>
<td>5.96</td>
<td>0.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.79</td>
<td>3.99</td>
</tr>
<tr>
<td><strong>Total PTE Increase of the New Emission Unit(s)/Process</strong></td>
<td>5.96</td>
<td>0.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.79</td>
<td>3.99</td>
</tr>
</tbody>
</table>

¹PM₂.₅ listed is direct PM₂.₅.
²Single highest HAP.

### 2012

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM₁₀</th>
<th>PM₂.₅¹</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP² (Chromium)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Empire DCM-80A</td>
<td>13.80</td>
<td>11.87</td>
<td>11.87</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total PTE Increase of the New Emission Unit(s)/Process</strong></td>
<td>13.80</td>
<td>11.87</td>
<td>11.87</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

¹PM₂.₅ listed is direct PM₂.₅.
²Single highest HAP.

### 2016


## PTE Increase of the New Emission Unit(s)/Process(es) (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</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>Single HAP$^2$ (Chromium)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Empire Microjet MJ-7 mini blaster</td>
<td>13.80</td>
<td>11.87</td>
<td>11.87</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total PTE Increase of the New Emission Unit(s)/Process</strong></td>
<td>13.80</td>
<td>11.87</td>
<td>11.87</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^2$Single highest HAP.

### 2019

<table>
<thead>
<tr>
<th>Process / Emission Unit</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>Single HAP$^2$ (Chromium)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>One (1) Trinco 136x36/IELUXW abrasive bead blasters</td>
<td>13.80</td>
<td>11.87</td>
<td>11.87</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW abrasive bead blasters</td>
<td>13.80</td>
<td>11.87</td>
<td>11.87</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total PTE Increase of the New Emission Unit(s)/Process</strong></td>
<td>27.6</td>
<td>23.74</td>
<td>23.87</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^2$Single highest HAP.

### Total

<table>
<thead>
<tr>
<th>Process / Emission Unit</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>Single HAP$^2$ (Chromium)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinders (Makino &amp; Scripta)</td>
<td>5.96</td>
<td>0.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.79</td>
<td>3.99</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^2$Single highest HAP.
### PTE Increase of the New Emission Unit(s)/Process(es) (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;&lt;sup&gt;1&lt;/sup&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;X&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP&lt;sup&gt;2&lt;/sup&gt; (Chromium)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Empire Microjet MJ-7 mini blaster</td>
<td>13.80</td>
<td>11.87</td>
<td>11.87</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Empire DCM-80A</td>
<td>13.80</td>
<td>11.87</td>
<td>11.87</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW abrasive bead blasters</td>
<td>13.80</td>
<td>11.87</td>
<td>11.87</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

### Total PTE Increase of the New Emission Unit(s)/Process (ton/year)

| PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.
| Single highest HAP. |

| Total PTE Increase of the New Emission Unit(s)/Process | 62.17 | 48.08 | 48.08 | - | - | - | - | 1.79 | 3.99 |

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units involves a change in operation, where the potential to emit of any pollutant increases as indicated below with potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants:

(i) PM, PM<sub>10</sub>, or direct PM<sub>2.5</sub>.

This SPR will be incorporated into the permit as MSOP w/ New Source Review (NSR).

### PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. 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.

### Source-Wide Emissions After Issuance (ton/year)

<table>
<thead>
<tr>
<th>PM&lt;sup&gt;1&lt;/sup&gt;</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;&lt;sup&gt;1&lt;/sup&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;&lt;sup&gt;1&lt;/sup&gt;&lt;sup&gt;,2&lt;/sup&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;X&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP&lt;sup&gt;3&lt;/sup&gt;</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives&lt;sup&gt;*&lt;/sup&gt;</td>
<td>194.12</td>
<td>50.94</td>
<td>50.50</td>
<td>0.01</td>
<td>1.37</td>
<td>0.09</td>
<td>1.15</td>
<td>9.91</td>
</tr>
</tbody>
</table>
The source opted to take PM10 and PM2.5 limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset), 326 IAC 2-8 (FESOP), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

(a) This existing stationary source is minor under Title V (326 IAC 2-7) because the potential to emit criteria pollutants and HAPs from the entire source is less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing stationary source is minor under PSD (326 IAC 2-2) because the potential to emit of all PSD regulated pollutants from the entire source is less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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 Metallic Mineral Processing Plants 40 CFR 60, Subpart LL and 326 IAC 12, are not included in the permit since this source is not considered a metallic mineral processing plant as defined in 40 CFR 60.381.

(b) There are no 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 Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 CFR 63, Subpart N, are not included in this permit since the two passivation tanks do not use chromium electroplating or anodizing. The two passivation tanks use a citric acid bath.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Steel Pickling – HCL Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63, Subpart CCC, are not included in this permit since this facility does not have continuous and batch pickling lines, hydrochloric acid regeneration plants, and hydrochloric acid storage vessels, and they are not a major source of HAPs.
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial for Institutional, Commercial, and Industrial Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (5D) (63.7480 through 63.7575) (326 IAC 20-95), are not included in this permit since the space heaters are not considered process heaters as defined in 40 CFR 63.7575 and since the source is not a major source of HAPs as defined in 40 CFR 63.2.

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJJ (6J), are not included in this permit since the two (2) natural gas-fired heaters do not meet the definition of a boiler as, defined in 40 CFR 63.11237.

The requirements of the National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Plating and Polishing Operations, 40 CFR 63, Subpart WWWW (6W), since this source is not considered plating and polishing facility as defined in 40 CFR 63.11510. The source does not perform any of the following operations:

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

Therefore, the requirements of 40 CFR 63, Subpart WWWW (6W) are not applicable and are not included in this permit.

The requirements of the National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX (6X), are not included in the permit since the source is not primarily engaged in operations which are classified in one of the nine source categories listed in 40 CFR 63.11514(a)(1) through (9). Even though they perform grinding, polishing and abrasive blasting using material containing MFHAP, the SIC/NAICS codes are not in one of the applicable codes listed under this rule.

There are no 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):

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 2-2 (PSD)
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.
326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
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 does not have potential fugitive particulate emissions greater than 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 Allen 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 Allen County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 8-2 (Surface Coating and Graphic Arts)
This source is not subject to the requirements of 326 IAC 8-2, because the source does not perform surface coating.

326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.

FESOP PM10 and PM2.5 Limit(s)
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

<table>
<thead>
<tr>
<th>Unit</th>
<th>PM10 Emission Limit (lb/hr)</th>
<th>PM2.5 Emission Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Infrablast MFI-3624</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire PF2636</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire Microjet MJ-J</td>
<td>0.95</td>
<td>0.95</td>
</tr>
</tbody>
</table>
Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at the source, shall limit the PM10 and PM2.5 from the entire source to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-8-4 not applicable.

**FESOP HAP Limit(s)**

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) Annual throughput/usage limit with associated emission limit in lb/ton

In order to make the requirements of 326 IAC 2-4.1 not applicable, the HAP emissions from the full finishing area-polishing operation shall not exceed the emission units listed in the table below:

<table>
<thead>
<tr>
<th>Unit</th>
<th>HAP Limit (Chromium)</th>
<th>HAP Limit (Nickel)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full Finishing Area - Polishing</td>
<td>1.44 lb/hr</td>
<td>1.52 lb/hr</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Compliance with these limits, combined with the potential to emit from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

**State Rule Applicability – Individual Facilities**

State rule applicability has been reviewed as follows:

**Abrasive Blasters**

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the emission units comprising the abrasive blasting operation shall not exceed the limits shown below. Process
weight rate = 80 lb/hr parts plus 315 lb/hr blast media (395 lb/hr total). 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 and \( P \) = process weight rate in tons per hour

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

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

Summary of Process Weight Rate Limits

<table>
<thead>
<tr>
<th>Process/ Emission Unit</th>
<th>( P ) (ton/hr)</th>
<th>( E ) (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Infrablast MFI-3624</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire PF2636</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire Microjet MJ-J</td>
<td>0.20</td>
<td>1.38</td>
</tr>
</tbody>
</table>

The dust collectors shall be in operation at all times, each of the emission units comprising the abrasive blasting operation is in operation, in order to comply with this limit.

Full Finishing Area - Polishing

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the full finishing area - polishing, 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 full finishing area – polishing, shall not exceed 2.06 pounds per hour when operating at a process weight rate of 0.36 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 and \( P \) = process weight rate in tons per hour

The Torit dust collector shall be in operation at all times the full finishing area- polishing is in operation, in order to comply with this limit.

Machining Operations

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the machining operation, 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 operation shall not exceed 7.86 pounds per hour when operating at a process weight rate of 2.64 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 and \( P \) = process weight rate in tons per hour

A control device is not needed, in order to comply with this limit.

Passivation

(a) **326 IAC 10 (Nitrogen Oxides Rules)**

Pursuant to 326 IAC 10-1-1(a), the two (2) passivation tanks are not subject to the requirements in 326 IAC 10, since the source is not located in Clark or Floyd counties. The source is located in Marshall county.

Combustion

(a) **326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)**

Pursuant to 326 IAC 6-2-4, the two (2) natural-gas fired heaters are not subject to the requirements of 326 IAC 6-2, since each of these units are not a source of indirect heating.

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

Each of the natural gas-fired space heaters at this source is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

(c) **326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)**

The emission unit is not subject to 326 IAC 7-1.1, because it has potential to emit sulfur dioxide (SO2) of less than 25 tons per year or 10 pound per hour.

(d) **326 IAC 9-1 (Carbon Monoxide Emission Limits)**

The requirements of 326 IAC 9-1 do not apply to this 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.

---

**Compliance Determination and Monitoring Requirements**

(a) The compliance determination and monitoring requirements applicable to this source are as follows:

(1) The dust collectors for particulate control shall be in operation and control emissions from each of the units comprising the abrasive blasting operations, and full finishing area for polishing, at all times that the abrasive blasting operations and full finishing area for polishing are in operation.

(2) In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) The compliance monitoring requirements applicable to this source are as follows:
These monitoring conditions are necessary because the Torit dust collector for the full finishing area must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

These monitoring conditions are necessary because the dust collectors for the 11 abrasive bead blasters must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

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

1. IDEM OAQ has determined that testing of the abrasive bead blasters and the associated dust collectors are not required at this time to determine compliance with the PM10/PM2.5, chromium or nickel emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.

---

**Proposed Changes**

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text:

1. IDEM, OAQ added new emission units to Section A.2 and new exempt units to Section A.3.

2. IDEM, OAQ added new units to Section D.1 and added a PM10/PM2.5 limit as well as HAP limits for Nickel and Chromium.

---

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]**

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

(a) Eleven (11) abrasive bead blasters, each with a maximum material throughput of 80 lb/hr, each with a maximum abrasive usage rate of 315.15 lb/hr, each using a dust collector for particulate control and exhausting into the building, consisting of the following units:

1. One (1) Trinco 36X36/IELUXE, constructed in 2011
2. Five (5) Trinco 136x36/IELUXW, constructed in 2013 and 2019
3. One (1) Infablast MFI-3624, constructed in 2011
4. Two (2) Empire DCM-80A, constructed in 2011 and 2012
5. One (1) Empire PF2636, constructed in 2011
6. One (1) Empire Microjet MJ-7, constructed in 2016

(b) Two (2) stainless steel passivation tanks with a nitric citric acid bath, identified as EU-01 and EU-05, constructed in 2014 and in 2017, each with a maximum capacity of 80 lb/hr of stainless steel, using no control and exhausting to stack S-01.
(c) One (1) Full Finishing Area for polishing of various stainless steels, identified as EU-04, constructed in 2011 and modified in 2014 and 2015, each with a maximum throughput of 80 lb/hr, using a Torit dust collector for particulate control and exhausting into the building, consisting of the seven (7) nine (9) grinders:

1. Two (2) Hammond 7-VRRO-B grinders, constructed in 2011
2. Two (2) Hammond VRRO grinders, constructed in 2011
3. One (1) Reliable B 368 grinder, constructed in 2011
4. One (1) Balvor 08J7 grinder, constructed in 2011
5. Two (2) Dynabrade 17407.00 grinder, constructed in 2011 and 2015
6. One (1) Hammond VRO grinder, constructed in 2014

(d) One (1) machining operation, identified as EU-03, constructed in 2011, each with a maximum throughput of 80 lb/hr, using no controls and exhausting into the building, consisting of the following units:

1. Nine (9) Mori Selki high speed 5 Axis Vertical Mills (wet), constructed in 2011
2. Four (4) Mori Selki Mill Turn Lathes (wet), three (3) constructed in 2011 and one (1) constructed in 2017
3. One (1) Nakamura Lathe (wet), constructed in 2014
4. One (1) Nakamura-Toma WY-100 Lathe (wet), constructed in 2018
5. Sixteen (16) Haas Mill (wet), three (3) constructed in 2011, four (4) constructed in 2012, two (2) constructed in 2018, and seven (7) constructed in 2019
6. Two (2) Star ECAS32T Swiss Lathes (wet), constructed in 2018
7. Two (2) Fanuc Wire EDM A1iD with rotary (wet), constructed in 2011
8. One (1) Fanuc Wire EDM A1iD2 with rotary (wet), constructed in 2016
9. One (1) Fanuc Wire RAM with rotary (wet), constructed in 2016
10. One (1) Bridgeport Mill (wet), constructed in 2011
11. One (1) Mitsui Surface Grinder (dry), constructed in 2011
12. One (1) Diato Horizontal Band Saw (dry), constructed in 2011
13. One (1) Profiler Plastic Shaper (dry), constructed in 2011
14. One (1) Standard Lathe
15. Seven (7) Swiss Lathes, three (3) constructed in 2011, one (1) constructed in 2013, two (2) constructed in 2015, and one (1) constructed in 2020
16. Two (2) Tool Grinders (Makino & Scripta)
17. Ten (10) Charmilles Wire EDM (wet), five (5) constructed in 2018 and five (5) constructed in 2019
18. Four (4) Matsuura Mills, three constructed in 2018 and one (1) constructed in 2019

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) Two (2) natural gas fired space heaters, each with a maximum heat input capacity of 1.6 MMBtu/hr.

(b) One (1) Portable Pressurized Acetylene Storage Tank, with a throughput of 2 tanks/month.

(c) Sixteen (16) 55-Gallon Storage Drums Containing Maintenance Raw Materials, with a throughput of 3 drums/month.

(d) Three (3) Stationary Closed, Non-Vented Tumbler Used for Cleaning or Deburring Metal Products without Abrasive Blasting, each with a throughput of 3 totes/month.

(e) Four (4) Pencil Grinders, constructed in 2009, used daily in metal finishing
(f) Four (4) 55-Gallon Vessel Storing Machining Fluid, each with a throughput of 3 drums/month.

(g) Paved Roads

---

**SECTION D.1 EMISSION UNIT OPERATION CONDITIONS**

**Emission Unit Description:**

(a) Eleven (11) abrasive bead blasters, each with a maximum material throughput of 80 lb/hr, each with a maximum abrasive usage rate of 315.15 lb/hr, each using a dust collector for particulate control and exhausting into the building, consisting of the following units:

1. One (1) Trinco 36X36/IELUXE, constructed in 2011
2. Five (5) Trinco 136x36/IELUXW, constructed in 2013 and 2019
3. One (1) Infablast MFI-3624, constructed in 2011
4. Two (2) Empire DCM-80A, constructed in 2011 and 2012
5. One (1) Empire PF2636, constructed in 2011
6. One (1) Empire Microjet MJ-7, constructed in 2016

(c) One (1) Full Finishing Area for polishing of various stainless steels, identified as EU-04, constructed in 2011 and modified in 2014 and 2015, each with a maximum throughput of 80 lb/hr, using a Torit dust collector for particulate control and exhausting into the building, consisting of the seven (7) nine (9) grinders:

1. Two (2) Hammond 7-VRRO-B grinders, constructed in 2011
2. Two (2) Hammond VRRO grinders, constructed in 2011
3. One (1) Reliable B 368 grinder, constructed in 2011
4. One (1) Balvor 08J7 grinder, constructed in 2011
5. Two (2) Dynabrade 17407.00 grinder, constructed in 2011 and 2015
6. One (1) Hammond VRO grinder, constructed in 2014

(d) One (1) machining operation, identified as EU-03, constructed in 2011, each with a maximum throughput of 80 lb/hr, using no controls and exhausting into the building, consisting of the following units:

1. Nine (9) Mori Selki high speed 5 Axis Vertical Mills (wet), constructed in 2011
2. Four (4) Mori Selki Mill Turn Lathes (wet), three (3) constructed in 2011 and one (1) constructed in 2017
3. One (1) Nakamura Lathe (wet), constructed in 2014
4. One (1) Nakamura-Toma WY-100 Lathe (wet), constructed in 2018
5. Sixteen (16) Haas Mill (wet), three (3) constructed in 2011, four (4) constructed in 2012, two (2) constructed in 2018, and seven (7) constructed in 2019
6. Two (2) Star ECAS32T Swiss Lathes (wet), constructed in 2018
7. Two (2) Fanuc Wire EDM A1iD with rotary (wet), constructed in 2011
8. One (1) Fanuc Wire EDM A1iD2 with rotary (wet), constructed in 2016
9. One (1) Fanuc Wire RAM with rotary (wet), constructed in 2016
10. One (1) Bridgeport Mill (wet), constructed in 2011
11. One (1) Mitsui Surface Grinder (dry), constructed in 2011
12. One (1) Diato Horizontal Band Saw (dry), constructed in 2011
13. One (1) Profiler Plastic Shaper (dry), constructed in 2011
14. One (1) Standard Lathe
Seven (7) Swiss Lathes, three (3) constructed in 2011, one (1) constructed in 2013, two (2) constructed in 2015, and one (1) in 2020

Two (2) Tool Grinders (Makino & Scripta)

Ten (10) Charmilles Wire EDM (wet), five (5) constructed in 2018 and five (5) constructed in 2019

Four (4) Matsuura Mills, three constructed in 2018 and one (1) constructed in 2019

(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 2-8-4(1)]

D.1.1 FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) the Permittee shall comply with the following:

<table>
<thead>
<tr>
<th>Unit</th>
<th>PM10 Emission Limit (lb/hr)</th>
<th>PM2.5 Emission Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Trinco 136x36/IELUXW</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Infrablast MFI-3624</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire PF2636</td>
<td>0.95</td>
<td>0.95</td>
</tr>
<tr>
<td>One (1) Empire Microjet MJ-J</td>
<td>0.95</td>
<td>0.95</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than one-hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 FESOP Limits [326 IAC 2-8-4][326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable, the Permittee shall comply with the following:

<table>
<thead>
<tr>
<th>Unit</th>
<th>Chromium</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full Finishing Area - Polishing</td>
<td>1.44 lb/hr</td>
<td>1.52 lb/hr</td>
</tr>
</tbody>
</table>

Compliance with this limit, combined with the potential to emit HAPs from all other emission units at the source, shall limit the source-wide potential to emit any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326IAC 2-7 (Part 70 Permits) not applicable.
D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the emission units comprising the abrasive blasting operation shall not exceed the limits shown below. The pound per hour limitation was calculated with the following equation:

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

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

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

<table>
<thead>
<tr>
<th>Process/ Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trinco 136X36/IELUXE</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
<td>0.20</td>
<td>1.38</td>
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<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
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<td>1.38</td>
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<tr>
<td>One (1) Trinco 36x36/IELUXE</td>
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<td>1.38</td>
</tr>
<tr>
<td>One (1) Infrablast MFI-3624</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire PF2636</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire Microjet MJ-J</td>
<td>0.20</td>
<td>1.38</td>
</tr>
<tr>
<td>Full Finishing Area for polishing</td>
<td>0.36</td>
<td>2.06</td>
</tr>
<tr>
<td>Combined Machining operations</td>
<td>2.64</td>
<td>7.86</td>
</tr>
</tbody>
</table>

D.1.4 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B- Preventive Maintenance Plan contains the Permittee’s obligation with regard to Preventive Maintenance Plans.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.6 Particulate Controls

In order to assure compliance with Condition D.1.4 D.1.3, the baghouses for particulate control shall be in operation and control emissions from the abrasive blasting operations and the full finishing area for polishing facility at all times the abrasive blasting operations and full finishing area for polishing are in operation.

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

***

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 6, 2019.
The construction of the proposed new and modified emission units and the operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. 003-42169-00395. The staff recommends to the Commissioner that the New Source Review and FESOP be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Shelby O'Neal, 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) 233-8578 or (800) 451-6027, and ask for Shelby O'Neal or (317) 233-8578.

(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

### Summary of Emissions

Company Name: LH Medical  
Source Address: 6932 Gettysburg Pike, Fort Wayne IN 46804  
Permit No.: 003-42169-00395  
Reviewer: Shelby O’Neal

<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>
</tr>
</thead>
<tbody>
<tr>
<td>Abrasive Blasting Operation</td>
<td>151.84</td>
<td>130.58</td>
<td>130.58</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Passivation</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.04</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Full Finishing Area - Polishing</td>
<td>26.81</td>
<td>2.68</td>
<td>2.68</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Machining Operations</td>
<td>12.02</td>
<td>1.30</td>
<td>1.30</td>
<td>-</td>
<td>-</td>
<td>0.02</td>
<td>-</td>
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<tr>
<td>Natural Gas Combustion (Space Heaters)</td>
<td>0.03</td>
<td>0.10</td>
<td>0.10</td>
<td>0.01</td>
<td>1.37</td>
<td>0.08</td>
<td>1.15</td>
</tr>
<tr>
<td>Pencil Grinders</td>
<td>0.50</td>
<td>0.50</td>
<td>0.50</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Fugitive Emissions - Paved Roads</td>
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<th>CO</th>
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<th>PM2.5</th>
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<tr>
<td>Fugitive Emissions - Paved Roads</td>
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## Appendix A: Emission Calculations

### PTE HAPs Summary

### Company Name: LH Medical

### Source Address: 6932 Gettysburg Pk, Fort Wayne IN 46804

### Permit No.: 003-42169-00395

### Reviewer: Shelby O'Neal

#### HAP Pollutant

<table>
<thead>
<tr>
<th></th>
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<th>Total</th>
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<td></td>
<td>0.54</td>
<td>0.24</td>
<td>2.89E-05</td>
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<tr>
<td>Phosphorus</td>
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<td></td>
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<tr>
<td>Benzene</td>
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</tr>
<tr>
<td>Cadmium</td>
<td>6.31</td>
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<td>9.91</td>
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<td>0.24</td>
<td>1.92E-05</td>
<td>0.78</td>
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<tr>
<td>Cobalt</td>
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<td>Dichlorobenzene</td>
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</tr>
<tr>
<td>Hexane</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Lead</td>
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</tr>
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</tr>
<tr>
<td>Toluene</td>
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<td></td>
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<td>4.67E-05</td>
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</table>

**Worst Single HAP = 2.33**

**Total Combined HAPs = 26.04**

---

### Limited Potential to Emit of HAPs (Tons/yr)

<table>
<thead>
<tr>
<th></th>
<th>Full Finishing Area - Polishing</th>
<th>Machining Operation</th>
<th>Natural Gas Combustion (Space Heaters)</th>
<th>Total</th>
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</thead>
<tbody>
<tr>
<td></td>
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<td>Benzene</td>
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<tr>
<td>Cadmium</td>
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<tr>
<td>Chromium</td>
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<tr>
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<tr>
<td>Toluene</td>
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<td></td>
<td>4.67E-05</td>
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</table>

**Worst Single HAP = 9.90**

**Total Combined HAPs = 23.72**
## Appendix A: Emissions Calculations

### New Units Summary

**Company Name:** LH Medical  
**Address City IN Zip:** 6932 Gettysburg Pike, Fort Wayne IN 46804  
**Permit No.:** 003-42169-00395  
**Reviewer:** Shelby O'Neal

<table>
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<th>Year</th>
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<th>NOx</th>
<th>VOC</th>
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<th>Total HAPs</th>
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<tr>
<td></td>
<td>Total</td>
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### Total CWOP/OWOP Emission Units

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<th>Emission Unit</th>
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<th>PM2.5</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
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<td>≥ 25</td>
<td>≥ 25</td>
<td>10</td>
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**Appendix A: Emission Calculations**

**Abrasive Blasting - Confined**

- Trinco 36X36/IELUXE
- Five (5) Trinco 136X36/IELUXE
- One (1) Infablast MFI-3624
- One (1) Empire PF2636
- One (1) Empire Microjet MJ-7
- Two (2) Empire DCM-80A

**Company Name:** LHI Medical

**Address City:** 6320 Gettysburg Pike, Fort Wayne IN 46804

**Permit No.:** 030-4168-00395

**Reviewer:** Shelby O'Neal

---

**Table 1 - Emission Factors for Abrasives**

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Emission Factor (EF)</th>
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<tbody>
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<td>Sand</td>
<td>0.041</td>
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<tr>
<td>Grit</td>
<td>0.015</td>
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<tr>
<td>Steel</td>
<td>0.004</td>
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<tr>
<td>Other</td>
<td>0.001</td>
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**Table 2 - Density of Abrasives (lb/ft³)**

<table>
<thead>
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<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
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<tr>
<td>Sand</td>
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</tr>
<tr>
<td>Steel</td>
<td>40</td>
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</table>

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

Flow rate (FR) of sand through a blasting nozzle as a function of nozzle pressure and internal diameter (ID)

**Flow Rate (FR) = Flow rate of abrasive (FR1) x ID/ID1**

**FR1 = Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3 = 0.85 lb/hr**

---

**CALCULATIONS**

Flow Rate of actual abrasive (FR) = FR1 x (ID/ID1)^2 x (D/D1)

**Adjusting Flow Rates for Different Abrasives and Nozzle Diameters**

**Flow Rate of Abrasive (FR) = Flow rate of abrasive at nozzle pressure and internal diameter (ID)**

**Flow Rate of Abrasive (FR1) of abrasive at nozzle pressure and internal diameter (ID)**

---

**METHODOLOGY**


**Flow rate of actual abrasive (FR) = FR1 x ID/ID1**

Potential to Emit (before control) = EF x FR x Number of Similar Units x (1 - w/200)

Potential to Emit (after control) = Potential to Emit (before control) x Control efficiency

**Notes:**

- Each of the units from the Abrasive Blasting operation is controlled by a dust collector for particulate control and deposited into the building.
- HAP emissions from the abrasive blasting process are expected to be negligible since the approximate thickness of the metal being removed from the abrasive blasting is negligible. The large majority of the emissions from the abrasive blasting come from the blasting media breaking down, not the material being blasted. The purpose of the blasting is to remove any small blemishes or to even out the medical device surfaces. No rust or other coatings are being removed from the medical devices.
**Appendix A: Emission Calculations**

**6-3-2 Applicability for Abrasive Blasting - Confined**

(One (1) Trinco 36X36/IELUXE, Five (5) Trinco 136X36/IELUXE, One (1) Infablast MFI-3624, One (1) Empire PF2636, One (1) Empire Microjet MJ-7, Two (2) Empire DCM-80A)

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Number of Units</th>
<th>Uncontrolled PTE of PM (lbs/hr)</th>
<th>Controlled PTE of PM (lbs/hr)</th>
<th>PM Emission Rate E (lbs/hr)</th>
<th>Can Uncontrolled PM comply with 6-3-2 Allowable Rate</th>
<th>Does the Control need to be in operation for Unit to comply with 6-3-2 Limit</th>
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<td>3.15E-03</td>
<td>1.38</td>
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<td>Yes</td>
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<td>One (1) Infablast MFI-3624</td>
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<td>3.15</td>
<td>3.15E-03</td>
<td>1.38</td>
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<td>Yes</td>
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<tr>
<td>Two (2) Empire PF2636</td>
<td>2</td>
<td>3.15</td>
<td>3.15E-03</td>
<td>1.38</td>
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<td>Yes</td>
</tr>
<tr>
<td>One (1) Empire Microjet MJ-7</td>
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<td>3.15E-03</td>
<td>1.38</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Methodology for 6-3-2 Applicability**

- Uncontrolled PTE per unit (lbs/hr) = EF x FR x Number of Similar Units x (1 - w/200) x N
- Controlled PTE of PM (lbs/hr) = Potential to Emit (before control) x (1 - control efficiency)
- Allowable PM Emission Rate E (lbs/hr) = 4.1 x Maximum Throughput (tons/hr) ^0.67

*Notes:
- Each of the units from the Abrasive Blasting operation is controlled by a dust collector for particulate control and exhausts into the building.*
Appendix A: Emission Calculations
New Abrasive Blasting - Confined

Company Name: LH Medical
Address City Zip: 6932 Gettysburg Pike, Fort Wayne IN 46804
Permit No.: 033-43168-00550
Reviewer: Shelby O'Neal

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
<th>lb PM10 / lb PM</th>
<th>PM10 emission factor ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al oxides</td>
<td>160</td>
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<td>0.70</td>
</tr>
<tr>
<td>Sand</td>
<td>99</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
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<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td>0.010</td>
<td>0.86</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>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
</tr>
<tr>
<td>Other</td>
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</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Nozzle Type</th>
<th>Internal Diameter (d)</th>
<th>FR1 (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. 2 (1/8 inch)</td>
<td>0.125</td>
<td>28</td>
</tr>
<tr>
<td>No. 3 (3/16 inch)</td>
<td>0.1875</td>
<td>65</td>
</tr>
<tr>
<td>No. 4 (1/4 inch)</td>
<td>0.250</td>
<td>109</td>
</tr>
<tr>
<td>No. 5 (5/16 inch)</td>
<td>0.3125</td>
<td>205</td>
</tr>
<tr>
<td>No. 6 (3/8 inch)</td>
<td>0.375</td>
<td>285</td>
</tr>
<tr>
<td>No. 7 (7/16 inch)</td>
<td>0.4375</td>
<td>385</td>
</tr>
<tr>
<td>No. 8 (1/2 inch)</td>
<td>0.500</td>
<td>503</td>
</tr>
<tr>
<td>No. 10 (5/8 inch)</td>
<td>0.625</td>
<td>820</td>
</tr>
<tr>
<td>No. 12 (3/4 inch)</td>
<td>0.750</td>
<td>1140</td>
</tr>
<tr>
<td>No. 16 (1 inch)</td>
<td>1.000</td>
<td>2030</td>
</tr>
</tbody>
</table>

CALCULATIONS

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)^2 x (D/D1)

where:
- FR1 = Flow rate (lb/hr) of abrasive at nozzle pressure and internal diameter (ID1)
- D = Density of actual abrasive (lb/ft³)
- ID = Internal diameter of actual nozzle (in)

Potential to Emit Before Control

PM = EF x FR x Number of Similar Units x (1 - w/200) x N

where:
- EF = PM emission factor for actual abrasive from Table 1
- N = Number of Similar Units
- w = fraction of time of wet blasting

Potential to Emit After Control

PM = PM x (1 - control efficiency)

Combined Potential to emit = PM x Number of Similar Units

METHODOLOGY


Notes:
- Each of the units from the Abrasive Blasting operation is controlled by a dust collector for particulate control and expels into the building.
- HAP emissions from the abrasive blasting process are expected to be negligible since the metal being removed from the abrasive blasting is negligible. The large majority of the emissions from the abrasive blasting come from the blasting media breakdown, not the material being blasted. The purpose of the blasting is to remove any small blemishes or to even out the medical device surfaces. No rust or other coatings are being removed from the medical devices.
Appendix A: Emission Calculations

6-3-2 Applicability for Abrasive Blasting - Confined

(Two (2) Trinco 136X36/IELUXE, One (1) Empire Microjet MJ-7, One (1) Empire DCM-80A)

Company Name: LH Medical
Address City In Zip: 6932 Gettysburg Pkwy, Fort Wayne IN 46804
Permit No.: 003-42169-00395
Reviewer: Shelby O'Neal

| Unit ID                  | Number of Units | Uncontrolled PTE of PM (lb/hr) | Controlled PTE of PM (lb/hr) | Unit ID 
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Two (2) Trinco 136X36/IELUXE</td>
<td>2</td>
<td>3.15</td>
<td>3.15E-03</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire DCM-80A</td>
<td>1</td>
<td>3.15</td>
<td>3.15E-03</td>
<td>1.38</td>
</tr>
<tr>
<td>One (1) Empire Microjet MJ-7</td>
<td>1</td>
<td>3.15</td>
<td>3.15E-03</td>
<td>1.38</td>
</tr>
</tbody>
</table>

Methodology for 6-3-2 Applicability

Uncontrolled PTE per unit (lb/hr) = EF x FR x Number of Similar Units x (1 - w/200) x N

Controlled PTE of PM (lb/hr) = (Potential to Emit (before control)) x (1 - control efficiency)

Allowable PM Emission Rate (lb/hr) = 4.1 x Maximum Throughput (tons/hr) ^0.67

Notes:
Each of the units from the Abrasive Blasting operation is controlled by a dust collector for particulate control and exhausts into the building.
**Appendix A: Emission Calculations**

**Passivation**

**Company Name:** LH Medical  
**Source Address:** 6932 Gettysburg Pike, Fort Wayne IN 46804  
**Permit Number:** 003-42169-00395  
**Reviewer:** Shelby O'Neal

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (lbs/hr)</th>
<th>Maximum Throughput (ton/hr)</th>
<th>Nox Emission Factor (lb/ton metal)*</th>
<th>Pounds of NOx emitted per hour</th>
<th>Pounds of NOx emitted per year</th>
<th>Tons of NOx emitted per year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Passivation Tank</td>
<td>80</td>
<td>0.04</td>
<td>0.1</td>
<td>4.00E-03</td>
<td>35.04</td>
<td>0.02</td>
</tr>
<tr>
<td>Passivation Tank</td>
<td>80</td>
<td>0.04</td>
<td>0.10</td>
<td>4.00E-03</td>
<td>35.04</td>
<td>0.02</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.04</td>
</tr>
</tbody>
</table>

*Emission factor borrowed from Michigan Department of Environmental Quality (MDEQ) Emission Calculation Fact Sheet
*Citric Acid Tank: The mixture in the tank is at 25% to 30% citric acid and the rest is water. This is the only chemical used.

**Methodology**

\[
\text{Maximum Throughput (ton/hr)} = \frac{\text{Maximum Throughput (lbs/hr)}}{2000 \text{ lbs}}
\]

\[
\text{Pounds of NOx emitted per hour} = \text{Maximum Throughput (ton/hr)} \times \text{Emission Factor (lb/ton metal)}
\]

\[
\text{Pounds of NOx emitted per year} = \text{Pounds of NOx emitted per hour} \times 8760 \text{ hours}
\]

\[
\text{Tons of NOx emitted per year} = \frac{\text{Pounds of NOx emitted per year}}{2000 \text{ lbs}}
\]

**REFERENCE**

KentChemistry. Partial Pressure and Mole Fractions. Website: http://www.kentchemistry.com/links/GasLaws/Molefraction.htm
## Appendix A: Emissions Calculations

### Machining Operations and Full Finishing Area

**Company Name:** LH Medical  
**Address City In Zip:** 6932 Gettysburg Pike, Fort Wayne IN 46804  
**Permit No.:** 003-42169-00395  
**Reviewer:** Shelby O'Neal

#### Coolant Use for Machining

<table>
<thead>
<tr>
<th>Process</th>
<th>Product Used</th>
<th>Density (lb/gal)</th>
<th>% Volatile by Volume (lbs VOC/gal)</th>
<th>Maximum Usage (gal/yr)</th>
<th>Maximum Usage (gal/hr)</th>
<th>PTE of VOC (lbs/hr)</th>
<th>PTE of VOC (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trim Sol</td>
<td>8.26</td>
<td>18.48%</td>
<td></td>
<td>165</td>
<td>0.019</td>
<td>0.003</td>
<td>0.04</td>
</tr>
</tbody>
</table>

**Notes**
- MSDS supplied by source indicates 18.48% volatile by volume
- There are no HAPs in the coolant

#### Process

<table>
<thead>
<tr>
<th>Process</th>
<th>Number of Units</th>
<th>Maximum Throughput (lb/hour)</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PM10 Emission Factor (ton/yr)</th>
<th>PM Emissions (tons/yr)</th>
<th>PM10 Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Machining Operation (wet)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lathes</td>
<td>1</td>
<td>80</td>
<td>0.01</td>
<td>0.01</td>
<td>1.75E-03</td>
<td>1.75E-03</td>
</tr>
<tr>
<td>Haas Mill</td>
<td>16</td>
<td>80</td>
<td>0.01</td>
<td>0.01</td>
<td>2.95E-02</td>
<td>2.95E-02</td>
</tr>
<tr>
<td>Mori South MI Twin Lathes</td>
<td>4</td>
<td>80</td>
<td>0.01</td>
<td>0.01</td>
<td>1.58E-02</td>
<td>1.58E-02</td>
</tr>
<tr>
<td>Starr EC35/85 Swiss</td>
<td>2</td>
<td>80</td>
<td>0.01</td>
<td>0.01</td>
<td>3.55E-03</td>
<td>3.55E-03</td>
</tr>
<tr>
<td>Fanuc Wire EDM A102 with rotary</td>
<td>1</td>
<td>80</td>
<td>0.01</td>
<td>0.01</td>
<td>5.28E-03</td>
<td>5.28E-03</td>
</tr>
<tr>
<td>Fanuc Wire EDM with rotary</td>
<td>1</td>
<td>80</td>
<td>0.01</td>
<td>0.01</td>
<td>1.75E-03</td>
<td>1.75E-03</td>
</tr>
<tr>
<td>Charmilles Wire EDM</td>
<td>10</td>
<td>80</td>
<td>0.01</td>
<td>0.01</td>
<td>7.51E-03</td>
<td>7.51E-03</td>
</tr>
<tr>
<td>Bridgeport Mill</td>
<td>1</td>
<td>80</td>
<td>0.01</td>
<td>0.01</td>
<td>1.75E-03</td>
<td>1.75E-03</td>
</tr>
<tr>
<td>Nakamura Lathes</td>
<td>1</td>
<td>80</td>
<td>0.01</td>
<td>0.01</td>
<td>1.75E-03</td>
<td>1.75E-03</td>
</tr>
<tr>
<td>Nakamura-Toma WY-100 Lathe</td>
<td>4</td>
<td>80</td>
<td>0.01</td>
<td>0.01</td>
<td>7.51E-03</td>
<td>7.51E-03</td>
</tr>
<tr>
<td><strong>Machining Operation (dry)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mitsui Surface Grinder**</td>
<td>1</td>
<td>80</td>
<td>17</td>
<td>1.7</td>
<td>2.98</td>
<td>0.30</td>
</tr>
<tr>
<td>Knurl Horizontal Band Saw**</td>
<td>1</td>
<td>80</td>
<td>17</td>
<td>1.7</td>
<td>2.98</td>
<td>0.30</td>
</tr>
<tr>
<td>Profiler Plastic Shaper***</td>
<td>1</td>
<td>80</td>
<td></td>
<td></td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Grinders Makino &amp; Scripta**</td>
<td>2</td>
<td>80</td>
<td>17</td>
<td>1.7</td>
<td>5.96</td>
<td>0.60</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total (lb/hr)</strong></td>
<td>5280</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Process Weight Rate (ton/hr)</strong></td>
<td>2.64</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Full Finishing Area - Polishing **

<table>
<thead>
<tr>
<th>Process</th>
<th>Number of Units</th>
<th>Maximum Throughput (lb/hour)</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PM10 Emission Factor (ton/yr)</th>
<th>PM Emissions (tons/yr)</th>
<th>PM10 Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Two (2) Hammond 7-VRRO-B grinders</td>
<td>9</td>
<td>80</td>
<td>17</td>
<td>1.7</td>
<td>26.81</td>
<td>2.68</td>
</tr>
<tr>
<td>One (1) Reliable B 368 grinders</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>One (1) Balvor 867 grinders</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Two (2) Dynabrade 17407.00 grinders</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>One (1) Hammond VRRO grinder</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total (lb/hr)</strong></td>
<td>720</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Process Weight Rate (ton/hr)</strong></td>
<td>0.36</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**NOTES**
- Assumed PM10 = PM2.5
- A coolant continuously floods the interface of the wet machining operations and emissions are expected to be negligible.
- Emission Factors for steel assumed to be equal to the US EPA WebFIRE emission factors for Grey Iron Foundry Grinding (SCC 30400340)
- *Emission Factors for steel assumed to be equal to the US EPA WebFIRE emission factors for Grey Iron Foundry Grinding (SCC 30400340)*
- The full finishing polishing operation uses a Torit dust collector for particulate control and exhausts outside.
- The full finishing polishing operation uses a Torit dust collector for particulate control and exhausts outside.
- The Torit dust collector has a 99% Control efficiency.

PM Emissions (ton/yr) = Number of Units * Maximum Throughput (lb/hr) * Emission factor (lb/ton) * 1 / 2,000 (lb/ton) * 8,760 (hr/yr)

Controlled PTE of PM (lb/hr) = [Uncontrolled Potential to Emit] * [1 - control efficiency]
### Appendix A: Emissions Calculations

#### Machining Operations and Full Finishing Area HAPs and 6-3 Determination

**Company Name:** LH Medical  
**Address City Zip:** 6932 Gettysburg Pike, Fort Wayne IN 46804  
**Permit No.:** 003-42169-00395  
**Reviewer:** Shelby O’Neal

<table>
<thead>
<tr>
<th></th>
<th>Phosphorus</th>
<th>Cobalt</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Machining Operation (ton/yr)</strong></td>
<td>0.24</td>
<td>0.24</td>
<td>3.61</td>
<td>0.72</td>
<td>3.25</td>
</tr>
<tr>
<td><strong>Machining Operation (lb/hr)</strong></td>
<td>0.05</td>
<td>0.05</td>
<td>0.84</td>
<td>0.16</td>
<td>0.74</td>
</tr>
<tr>
<td><strong>Full Finishing Area - Polishing (ton/yr)</strong></td>
<td>0.54</td>
<td>0.54</td>
<td>6.31</td>
<td>1.61</td>
<td>6.66</td>
</tr>
<tr>
<td><strong>Full Finishing Area - Polishing (lb/hr)</strong></td>
<td>0.12</td>
<td>0.12</td>
<td>1.44</td>
<td>0.37</td>
<td>1.52</td>
</tr>
</tbody>
</table>

#### Full Finishing Area - Polishing

**Phosphorus**: 2.00%  
**Cobalt**: 2.00%  
**Chromium**: 30.00%  
**Manganese**: 6.00%  
**Nickel**: 27.00%

**Potential HAP Emissions (tons/yr)** = Uncontrolled PM Emissions (tons/yr) * HAP WT%

**NOTES**

*HAP Wt % was determined from the MSDS sheets provided by the source.

---

### MethODOLOGY

**Potential HAP Emissions (tons/yr)** = Uncontrolled PM Emissions (tons/yr) * HAP WT%

**METHODOLOGY**

**Uncontrolled PM Emissions (tons/yr)** = Uncontrolled Potential Emissions (tons/hr) / 8760 (hrs/yr)

**Controlled PM Emissions (tons/hr)** = Uncontrolled Potential Emissions (tons/hr) * (1 - Control Efficiency)

**Uncontrolled Potential to Emit**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Uncontrolled PM Emissions (tons/hr)</th>
<th>Controlled PM Emissions (tons/hr)</th>
<th>6-3-2 Allowable Emissions (lbs/hr)</th>
<th>6-3-2 Applicability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Machining Operation</td>
<td>2.7</td>
<td>2.7</td>
<td>8.88</td>
<td>No</td>
</tr>
<tr>
<td>Full Finishing Area - Polishing</td>
<td>6.12</td>
<td>0.06</td>
<td>2.07</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Methodology for 5-3-2 Applicability**

**Uncontrolled PTE of PM (lb/hr) = Uncontrolled Potential Emissions (tons/hr) * 2000 (lbs/ton) / 8760 (hrs/yr)**

**Controlled PTE of PM (lb/hr) = Uncontrolled PTE of PM (tons/hr) * (1 - Control Efficiency)**

**Allowable PM Emission Rate E (lbs/hr) = 4.1 * Maximum Throughput (tons/hr) / 10.67**

Pursuant to 326 IAC 6-3-2(e) when the process weight rate is less than one hundred (100) pounds per hour, the allowable particulate emission rate is few hundred (100) pounds per hour.

---

**Notes**

- Since all of the units part of the full finishing polishing operation use the same control device, the lb/hr associated with the combined emissions for the full finishing polishing operation was used to determine 326 IAC 6-3-2 applicability.
## Emissions Calculations

### Grinders (Makino & Scripta)

<table>
<thead>
<tr>
<th>Process</th>
<th>Number of Units</th>
<th>Maximum Throughput (lb/hr)</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PM10 Emission Factor (lb/ton)</th>
<th>PM Emissions (tons/year)</th>
<th>PM10 Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Machine Operation (Part of Machining Operation)</td>
<td>2</td>
<td>80</td>
<td>17</td>
<td>1.7</td>
<td>0.56</td>
<td>0.06</td>
</tr>
<tr>
<td>Machine Operation (Dry)</td>
<td><strong>Grinders (Makino &amp; Scripta)</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>Total PTE (tons/yr)</strong>: 0.66</td>
<td><strong>PM10 Emissions (tons/yr)</strong>: 0.06</td>
</tr>
</tbody>
</table>

**NOTES**

- Assumed PM10 = PM2.5
- **Grinders (Makino & Scripta) are a part of the Machining Operation**

**METHODOLOGY**

- **PM Emissions (ton/yr)** = Number of Units * Maximum Throughput (lb/hr) * 1 / 2,000(lb/ton) * Emission factor (lb/ton) * 1 / 2,000(lb/ton) * 8,760 (hr/yr)
- **Controlled PTE of PM (lbs/hr)** = [Uncontrolled Potential to Emit] * [1 - control efficiency]

### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Element</th>
<th>Phosphorus</th>
<th>Cobalt</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wt%</td>
<td>2.00%</td>
<td>2.00%</td>
<td>30.00%</td>
<td>6.00%</td>
<td>27.00%</td>
</tr>
<tr>
<td>Machining Operation (ton/yr)</td>
<td>0.12</td>
<td>0.12</td>
<td>1.79</td>
<td>0.36</td>
<td>1.61</td>
</tr>
<tr>
<td>Machining Operation (lb/hr)</td>
<td>0.03</td>
<td>0.03</td>
<td>0.41</td>
<td>0.06</td>
<td>0.37</td>
</tr>
</tbody>
</table>

**METHODOLOGY**

- **Potential HAP Emissions (ton/yr)** = Uncontrolled PM Emissions (ton/yr) * HAP WT%
## Appendix A: Emission Calculations

### 6-3-2 Applicability for Machining Operations and Full Finishing Area

**Company Name:** LH Medical  
**Address City In Zip:** Gettysburg Pike, Fort Wayne IN 46804  
**Permit No.:** 003-42169-00395  
**Reviewer:** Shelby O’Neal

---

#### Methodology for 6-3-2 Applicability

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Uncontrolled PM (lbs/hr)</th>
<th>Controlled PM (lbs/hr)</th>
<th>Allowable Emission Rate (lbs/hr)</th>
<th>Need to comply with 6-3-2 Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Machining Operation</td>
<td>2.7</td>
<td>2.7</td>
<td>4.1 Maximum throughputs (tons/hr) ^0.67</td>
<td>No</td>
</tr>
</tbody>
</table>

- **Uncontrolled PM (lbs/hr):** Uncontrolled Potential Emissions (Tons/Year) * 2000 (lbs/ton) / 8760 (hrs/yr)
- **Controlled PM (lbs/hr):** Uncontrollable PM (tons/yr) * (1 - Control Efficiency)
- **Allowable PM Emission Rate E (lbs/hr):** 4.1 * Maximum Throughputs (tons/hr) ^0.67

- The Torit dust collector has a 99% Control efficiency.
- Pursuant to 326 IAC 6-3-2(e) when the process weight rate is less than one hundred (100) pounds per hour, the allowable particulate emission rate is five hundred fifty-one thousandths (0.551) pounds per hour.

---

### Notes

- Since all of the units part of the full finishing polishing operation use the same control device, the TCM associated with the combined emissions for the full finishing polishing operation was used to determine 326 IAC 6-3-2 applicability.
- The full finishing polishing operation uses Torit dust collector and exhausts outside.
- The full finishing polishing operation has a 99% particulate collection efficiency.
Appendix A: Emissions Calculations

Natural Gas Combustion

Company Name: LH Medical
Source Address: 6932 Gettysburg Pike, Fort Wayne, IN 46804
Permit No. 003-42169-00395
Reviewer: Shelby O'Neal

<table>
<thead>
<tr>
<th>Heat Input Capacity MMBtu/hr</th>
<th>HHV mmBtu</th>
<th>Potential Throughput MMCF/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.2</td>
<td>1020</td>
<td>27.5</td>
</tr>
</tbody>
</table>

2 Space heater rated at 1.6 MMBtu/hr, each

<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>PM</td>
<td>1.9</td>
<td>0.03</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.10</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.10</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.01</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>1.37</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.68</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>1.15</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

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

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 Throuput (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)

**HAPs - Organics**

<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>Benzene</td>
<td>2.1E-03</td>
<td>2.886E-05</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
<td>1.649E-05</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
<td>1.031E-03</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
<td>2.473E-02</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
<td>4.672E-05</td>
</tr>
</tbody>
</table>

**HAPs - Metals**

<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>Lead</td>
<td>5.0E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
<td>0.000</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
<td>0.000</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.8E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
<td>0.000</td>
</tr>
</tbody>
</table>

Total HAPs 0.03

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: Emission Calculations
#### Exempt Activities Emissions Summary

**Company Name:** LH Medical  
**Source Address:** 6932 Gettysburg Pike, Fort Wayne IN 46804  
**Permit Number:** 003-42169-00395  
**Reviewer:** Shelby O'Neal

<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>Passivation Tanks</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Pencil Grinders**</td>
<td>0.50</td>
<td>0.50</td>
<td>0.50</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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</tr>
<tr>
<td>Lathes</td>
<td>1.75E-03</td>
<td>1.75E-03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Haas Mills</td>
<td>0.03</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Swiss Lathes</td>
<td>0.01</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Mori Seiki high speed 5 Axis Vertical Mills</td>
<td>0.02</td>
<td>0.02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Mori Seiki Mill Turn Lathes</td>
<td>0.002</td>
<td>0.002</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Star ICA5321 Swiss</td>
<td>0.004</td>
<td>0.004</td>
<td>-</td>
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<td>-</td>
<td>-</td>
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<tr>
<td>Fanuc Wire EDM A1iD with rotary</td>
<td>0.003</td>
<td>0.004</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Fanuc Wire EDM A1iD2 with rotary</td>
<td>0.002</td>
<td>0.002</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Fanuc Wire RAM with rotary</td>
<td>0.002</td>
<td>0.002</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<td>-</td>
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<tr>
<td>Charmilles Wires EDM</td>
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<td>-</td>
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<td>-</td>
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</tr>
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<td>Bridgeport Mill</td>
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<td>-</td>
<td>-</td>
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<tr>
<td>Nakamura Lathes</td>
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<tr>
<td>Nakamura-Toma WY-100 Lathes</td>
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<td>-</td>
<td>-</td>
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<td>Matsuura Mills</td>
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<td>-</td>
<td>-</td>
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<td>-</td>
<td>-</td>
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<tr>
<td><strong>Total</strong></td>
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<td><strong>0.60</strong></td>
<td><strong>0.50</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.04</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>3.25</strong></td>
</tr>
</tbody>
</table>

**Exemption Thresholds**

|   | 5 | 5 | 5 | 10 | 10 | 10 | 25 | 25 |

**Notes:**

* PM2.5 listed is direct PM2.5  
**Total PTE for Pencil Grinders was conservatively estimated to be 0.50 ton/yr
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 per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (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>20.0</td>
<td>1.0</td>
<td>20.0</td>
<td>25.0</td>
<td>500.0</td>
<td>1000</td>
<td>3.8</td>
<td>1.392</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>20.0</td>
<td>1.0</td>
<td>20.0</td>
<td>25.0</td>
<td>500.0</td>
<td>1000</td>
<td>3.8</td>
<td>1.392</td>
</tr>
<tr>
<td>Totals</td>
<td>40.0</td>
<td>1000.0</td>
<td>7.6</td>
<td>2765.2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = \( \frac{25.0}{40.0} \) tons/trip

Average Miles Per Trip = \( \frac{1000}{40.0} \) miles/hp

Unmitigated Emission Factor, \( \text{Ef} \) = \[ k \times (sL)^{0.91} \times W^{1.02} \] (Equation 1 from AP-42 13.2.1)

where \( k = 0.011 \), \( W = 25.0 \) tons = average vehicle weight

\( sL = 9.7 \) g/m² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \( \text{Eext} = \text{Ef} \times \left[ 1 - \left( \frac{p}{4N} \right) \right] \) (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, \( \text{Eext} \) = \( \text{Ef} \times \left[ 1 - \left( \frac{125}{365} \right) \right] \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

PM2.5 = Particle Matter (<2.5 um)

Methodology

- **Total Weight driven per day (ton/day)** = (Maximum Weight of Loaded Vehicle (tons/hp)) * (Maximum trips per day (trip/day))
- **Maximum one-way distance (miles/yr)** = (Maximum one-way miles (miles/day)) * (Maximum one-way trips per day (trip/day))
- **Average Vehicle Weight Per Trip (tons/hp)** = \( \frac{\text{Total Weight driven per day (ton/day)}}{\text{Maximum trips per day (trip/day)}} \)
- **Average Miles Per Trip (miles/hp)** = \( \frac{\text{Maximum one-way distance (miles/yr)}}{\text{Maximum one-way trips per year (trip/year)}} \)
- **Mitigated PTE (tons/yr)** = \( \frac{\text{Maximum one-way miles (miles/yr)}}{\text{Mitigated Emission Factor (lb/mile)}} \) * (ton/2000 lbs)
- **Mitigated PTE (After Control) (tons/yr)** = \( \frac{\text{Mitigated PTE (Before Control) (tons/yr)}}{\text{Dust Control Efficiency}} \)
January 16, 2020

Mr. Tom Harris  
LH Medical  
6932 Gettysburg Pike  
Fort Wayne, Indiana 46809

Re: Public Notice  
LH Medical  
Permit Level: FESOP with New Source Review  
Permit Number: 003-42169-00395

Dear Mr. Harris:

Enclosed is a copy of your draft FESOP with New Source Review, 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 Allen County Public Library (Aboite Branch), 5630 Coventry Lane in Fort Wayne, 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 Shelby O’Neal, 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 3-8578 or dial (317) 233-8578.

Sincerely,

John F. Jackson  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter 4/12/19
January 16, 2020

To: Allen County Public Library (Aboite Branch)

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: LH Medical
Permit Number: 003-42169-00395

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.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

January 16, 2020
LH Medical
003-42169-00395

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

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<td>Postage</td>
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<td>Tom Harris LH Medical 6932 Gettysburg Pike Fort Wayne IN 46809 (Source CAATS)</td>
</tr>
<tr>
<td>2</td>
<td>Cari Mansfield Environmental, Health &amp; Safety LH Medical 4420 Clubview Dr Fort Wayne IN 46804 (RO CAATS)</td>
</tr>
<tr>
<td>3</td>
<td>Daniel &amp; Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)</td>
</tr>
<tr>
<td>4</td>
<td>Duane &amp; Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)</td>
</tr>
<tr>
<td>5</td>
<td>Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)</td>
</tr>
<tr>
<td>6</td>
<td>Mr. Jeff Coburn Plumbers &amp; Steamfitters, Local 166 2930 W Ludwag Rd Fort Wayne IN 46818-1328 (Affected Party)</td>
</tr>
<tr>
<td>7</td>
<td>Roanoke Town Council P.O. Box 328 Roanoke IN 46783 (Local Official)</td>
</tr>
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<td>8</td>
<td>Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)</td>
</tr>
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<td>9</td>
<td>Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)</td>
</tr>
<tr>
<td>10</td>
<td>Mr. Jason Morrison SevenGen 604 W Wayne St Fort Wayne IN 46802 (Consultant)</td>
</tr>
<tr>
<td>11</td>
<td>Allen County Public Library-Aboite Branch 5630 Coventry Lane Fort Wayne IN 46804 (Library)</td>
</tr>
<tr>
<td>12</td>
<td>6930 Gettysburg Way Fort Wayne IN 46804 (Affected Party)</td>
</tr>
<tr>
<td>13</td>
<td>Lasting Change, Inc. 7136 Gettysburg Way Fort Wayne IN 46804 (Affected Party)</td>
</tr>
<tr>
<td>14</td>
<td>Gary &amp; Pamela Hilgman 816 Hadley Road Fort Wayne IN 46804 (Affected Party)</td>
</tr>
<tr>
<td>15</td>
<td>Lincoln arkway, LLC 6927 Lincoln Parkway Fort Wayne IN 46804 (Affected Party)</td>
</tr>
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**Total number of pieces Listed by Sender**: 15

**Total number of Pieces Received at Post Office**: 15

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

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Mail Code 61-53

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<th>Rest. Del. Fee</th>
<th>Remarks</th>
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<tr>
<td>1</td>
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<td>Wildwood Racquet Club 508 Hadley Road Fort Wayne IN 46804 (Affected Party)</td>
<td></td>
<td></td>
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<tr>
<td>2</td>
<td></td>
<td>Lisa Green  The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)</td>
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Total number of pieces Listed by Sender: 15

Total number of Pieces Received at Post Office: 15

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.