



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
*Governor*

**Bruno L. Pigott**  
*Commissioner*

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Suzuki Garphyttan Corporation in St. Joseph County

MSOP Renewal No.: M141-43198-00558

The Indiana Department of Environmental Management (IDEM) has received an application from Suzuki Garphyttan Corporation located at 4404 Nimitz Parkway, South Bend, IN 46628 for a renewal of its MSOP issued on December 30, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Suzuki Garphyttan Corporation to continue to operate its existing source.

The applicant intends to construct and operate 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.

A copy of the permit application and IDEM's preliminary findings have been sent to:

St. Joseph County Public Library  
304 South Main Street  
South Bend, IN 46601

and

IDEM Northern Regional Office  
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450  
South Bend, IN 46601-1295

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

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access 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 30<sup>th</sup> 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 M141-43198-00558 in all correspondence.

**Comments should be sent to:**

Travis Flock  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Travis Flock or (317) 233-1782  
Or dial directly: (317) 233-1782  
Fax: (317) 232-6749 attn: Travis Flock  
E-mail: [tflock@idem.IN.gov](mailto:tflock@idem.IN.gov)

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; 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 and will also be sent to the local library indicated above, the IDEM Regional Office indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Travis Flock or my staff at the above address.



Brian Williams, Section Chief  
Permits Branch  
Office of Air Quality



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**Eric J. Holcomb**  
Governor

**DRAFT**

**Bruno L. Pigott**  
Commissioner

## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Suzuki Garphyttan Corporation  
4404 Nimitz Parkway  
South Bend, Indiana 46628**

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

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

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

Operation Permit No.: M141-43198-00558	
Master Agency Interest ID: 10564	
Issued by:	Issuance Date:
Brian Williams, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary spring wire manufacturing operation.

Source Address:	4404 Nimitz Parkway, South Bend, Indiana 46628
General Source Phone Number:	574-232-8800
SIC Code:	3315 (Steel Wiredrawing and Steel Nails and Spikes)
County Location:	St Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) shaving machines, constructed in 1997, which receives 2,976 lbs of wire per hour, total, for shaving, using lubricating oils with a combined maximum hourly material usage rate of 0.55 gals/hr.
- (b) One (1) acid pickling operation, constructed in 1997, that uses hydrogen chloride (HCl) to remove oxide scale from wire, vented to a wet scrubber. The acid pickling operation consists of:
  - (1) One (1) patenting operation, consisting of a heat treatment process that utilizes two (2) electric furnaces, one (1) electric induction preheat, and one (1) molten lead bath, with powdered lime added to form a top barrier;
  - (2) Two (2) heated HCl acid baths with a joint capacity of 500 gallons and with a combined maximum throughput of 150 gallons of virgin HCl added per day;
  - (3) Two (2) water rinse baths;
  - (4) Two (2) caustic baths for surface cleaning;
  - (5) One (1) heated zinc phosphate bath to prepare for drawing, with a wastewater pre-treatment operation;
  - (6) One (1) coating bath of approximately 340 gallons in size containing a non-VOC, non-HAP containing powder mixed with water and applied to at most 50% of the wires being prepared for drawing;
  - (7) One (1) lime bath to help neutralize any acid remaining on the wire.

- (c) Four (4) drawing machines/lines, constructed in 1997, and one (1) drawing machine/line, approved in 2015 for construction, in which coated wire from the pickling line is run through a series of dies, which includes the maximum combined addition of 6.85 lbs/hour soap powder as a lubricant. Vacuum hoses are connected to the line to recapture the soap powder and direct it into containers.
- (d) One (1) hardening operation, consisting of the following:
  - (1) Three (3) hardening 12-wire electric furnaces, constructed in 1997, and one (1) hardening 12-wire electric furnace, approved in 2015 for construction.
  - (2) One (1) electric induction preheat at one hardening line (OH 400)
  - (3) Quench oil baths/trays servicing all four hardening lines with a combined maximum hourly material usage rate of 1.72 gals/hr.
  - (4) Four (4) lead baths, constructed in 1997, used as a cooling media and heat treat media for the wire with powdered lime added to form a top barrier.
  - (5) Rust protective oil reservoir tanks/trays servicing all four hardening lines with a combined maximum hourly material usage rate of 1.47 gals/hr.
- (e) One (1) quality-control testing operation, identified as EC Testing Operation, consisting of four (4) EC testing lines, constructed in 1997, and one (1) EC testing line, approved in 2015 for construction, utilizing spray coating with a maximum combined hourly material usage rate of 0.48 lbs/hr and a solvent with a maximum combined hourly material usage rate of 0.14 lbs/hr to remove the spray coating upon inspection completion.
- (f) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
  - (1) One (1) natural gas-fired boiler, identified as Boiler #1, with a maximum capacity of 3.35 million Btu per hour, constructed in 1997.
  - (2) One (1) natural-gas fired air make-up unit, identified as AMU#1, with a maximum capacity of 4.26 million Btu per hour, constructed in 1997.
  - (3) One (1) natural-gas fired air make-up unit, identified as AMU#2, with a maximum capacity of 4.95 million Btu per hour, constructed in 2000.
  - (4) One (1) natural gas-fired air makeup unit, identified as AMU#3, constructed in 2020, with a maximum heat input capacity of 5.32 MMBtu/hr.
  - (4) One (1) natural gas-fired furnace, identified as F01, constructed in 2000, with a maximum capacity of 0.55 MMBtu/hr, using no controls, and exhausting outdoors.
  - (5) One (1) natural gas-fired space heater, identified as MH1, constructed in 2000, with a maximum capacity of 0.05 MMBtu/hr, using no controls, and exhausting outdoors.
  - (6) One (1) natural gas-fired space heater, identified as ECH1, constructed in 2000, with a maximum capacity of 0.08 MMBtu/hr, using no controls, and exhausting outdoors.

- (g) One metal inert gas (MIG) welding operation, constructed in 1997, with a maximum wire consumption of 0.0375 lbs wire per hour.
- (h) One (1) TIG welding operation, constructed in 1997, with a maximum rod consumption of 0.0375 pounds per hour, and exhausting indoors.
- (i) One (1) parts washer, using a citrus-based solvent, with a maximum capacity of 15 gallons.

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, M141-43198-00558, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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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

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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

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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

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

### B.7 Duty to Provide Information

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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 Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) All terms and conditions of permits established prior to M141-43198-00558 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.14 Source Modification Requirement**

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

**B.15 Inspection and Entry**  
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

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

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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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 2-6.1-5(a)(1)]**

**C.1 Permit Revocation [326 IAC 2-1.1-9]**

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

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

**C.2 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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

**C.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]**

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

#### C.7 Performance Testing [326 IAC 3-6]

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

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

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

### Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

#### C.9 Compliance Monitoring [326 IAC 2-1.1-11]

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

#### C.10 Instrument Specifications [326 IAC 2-1.1-11]

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

## Corrective Actions and Response Steps

### C.11 Response to Excursions or Exceedances

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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.12 Actions Related to Noncompliance Demonstrated by a Stack Test

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

### C.13 Malfunctions Report [326 IAC 1-6-2]

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

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

### C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

### C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (b) One (1) acid pickling operation, constructed in 1997, that uses hydrogen chloride (HCl) to remove oxide scale from wire, vented to a wet scrubber. The acid pickling operation consists of:
  - (1) One (1) patenting operation, consisting of a heat treatment process that utilizes two (2) electric furnaces, one (1) electric induction preheat, and one (1) molten lead bath, with powdered lime added to form a top barrier;
  - (2) Two (2) heated HCl acid baths with a joint capacity of 500 gallons and with a combined maximum throughput of 150 gallons of virgin HCl added per day;
  - (3) Two (2) water rinse baths;
  - (4) Two (2) caustic baths for surface cleaning;
  - (5) One (1) heated zinc phosphate bath to prepare for drawing, with a wastewater pre-treatment operation;
  - (6) One (1) coating bath of approximately 340 gallons in size containing a non-VOC, non-HAP containing powder mixed with water and applied to at most 50% of the wires being prepared for drawing;
  - (7) One (1) lime bath to help neutralize any acid remaining on the wire.
- (c) Four (4) drawing machines/lines, constructed in 1997, and one (1) drawing machine/line, approved in 2015 for construction, in which coated wire from the pickling line is run through a series of dies, which includes the maximum combined addition of 6.85 lbs/hour soap powder as a lubricant. Vacuum hoses are connected to the line to recapture the soap powder and direct it into containers.
- (d) One (1) hardening operation, consisting of the following:
  - (1) Three (3) hardening 12-wire electric furnaces, constructed in 1997, and one (1) hardening 12-wire electric furnace, approved in 2015 for construction.
  - (2) One (1) electric induction preheat at one hardening line (OH 400)
  - (3) Quench oil baths/trays servicing all four hardening lines with a combined maximum hourly material usage rate of 1.72 gals/hr.
  - (4) Four (4) lead baths, constructed in 1997, used as a cooling media and heat treat media for the wire with powdered lime added to form a top barrier.
  - (5) Rust protective oil reservoir tanks/trays servicing all four hardening lines with a combined maximum hourly material usage rate of 1.47 gals/hr.
- (e) One (1) quality-control testing operation, identified as EC Testing Operation, consisting of four (4) EC testing lines, constructed in 1997, and one (1) EC testing line, approved in 2015 for construction, utilizing spray coating with a maximum combined hourly material usage rate of 0.48 lbs/hr and a solvent with a maximum combined hourly material usage rate of 0.14 lbs/hr

to remove the spray coating upon inspection completion.

- (f) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
- (1) One (1) natural gas-fired boiler, identified as Boiler #1, with a maximum capacity of 3.35 million Btu per hour, constructed in 1997.
  - (2) One (1) natural-gas fired air make-up unit, identified as AMU#1, with a maximum capacity of 4.26 million Btu per hour, constructed in 1997.
  - (3) One (1) natural-gas fired air make-up unit, identified as AMU#2, with a maximum capacity of 4.95 million Btu per hour, constructed in 2000.
  - (4) One (1) natural gas-fired air makeup unit, identified as AMU#3, constructed in 2020, with a maximum heat input capacity of 5.32 MMBtu/hr.
  - (4) One (1) natural gas-fired furnace, identified as F01, constructed in 2000, with a maximum capacity of 0.55 MMBtu/hr, using no controls, and exhausting outdoors.
  - (5) One (1) natural gas-fired space heater, identified as MH1, constructed in 2000, with a maximum capacity of 0.05 MMBtu/hr, using no controls, and exhausting outdoors.
  - (6) One (1) natural gas-fired space heater, identified as ECH1, constructed in 2000, with a maximum capacity of 0.08 MMBtu/hr, using no controls, and exhausting outdoors.
- (g) One metal inert gas (MIG) welding operation, constructed in 1997, with a maximum wire consumption of 0.0375 lbs wire per hour.
- (h) One (1) TIG welding operation, constructed in 1997, with a maximum rod consumption of 0.0375 pounds per hour, and exhausting indoors.

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

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

#### **D.1.1 PM Limitations Except Lake County [326 IAC 6.5-1-2]**

Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from the one (1) acid pickling operation; five (5) lead baths; powdered lime addition; one (1) drawing operation; one hardening operation; one (1) natural-gas fired air make-up unit, identified as AMU#1; one (1) natural-gas fired air make-up unit, identified as AMU#2; one (1) natural gas-fired air make-up unit, identified as AMU#3, one (1) natural gas-fired furnace, identified as F01, one (1) natural gas-fired space heater, identified as MH1, one (1) natural gas-fired heater, identified as ECH1, one (1) metal inert gas (MIG) welding operation, and one (1) tungsten inert gas welding operation, shall each not exceed 0.03 grains per dry standard cubic foot (dscf) each.

#### **D.1.2 PM Limitations Except Lake County [326 IAC 6.5-1-2]**

Pursuant to 326 IAC 6.5-1-2(b)(3), particulate emissions from the one (1) natural gas-fired boiler, identified as Boiler #1 shall not exceed 0.01 grains per dry standard cubic foot (dscf) of natural gas burned.

#### **D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

maintenance plan required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Suzuki Garphyttan Corporation
<b>Source Address:</b>	4404 Nimitz Parkway
<b>City:</b>	South Bend, Indiana 46628
<b>Phone #:</b>	574-232-8800
<b>MSOP #:</b>	M141-43198-00558

I hereby certify that Suzuki Garphyttan Corporation is:

still in operation.

no longer in operation.

I hereby certify that Suzuki Garphyttan Corporation is:

in compliance with the requirements of MSOP M141-43198-00558.

not in compliance with the requirements of MSOP M141-43198-00558.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FAX NUMBER: (317) 233-6865**

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

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

**Source Description and Location**

<b>Source Name:</b>	<b>Suzuki Garphyttan Corporation</b>
<b>Source Location:</b>	<b>4404 Nimtz Parkway, South Bend, IN 46628</b>
<b>County:</b>	<b>St. Joseph (German)</b>
<b>SIC Code:</b>	<b>3315 (Steel Wiredrawing and Steel Nails and Spikes)</b>
<b>Permit Renewal No.:</b>	<b>M141-43198-00558</b>
<b>Permit Reviewer:</b>	<b>Travis Flock</b>

On August 26, 2020, Suzuki Garphyttan Corporation submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Suzuki Garphyttan Corporation relating to the operation of a spring wire manufacturing operation. Suzuki Garphyttan Corporation was issued its first MSOP (M141-36281-00558) on December 30, 2015.

**Existing Approvals**

The source was issued MSOP NSC No. M141-36281-00558 on December 30, 2015. There have been no subsequent approvals issued.

**Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) Two (2) shaving machines, constructed in 1997, which receives 2,976 lbs of wire per hour, total, for shaving, using lubricating oils with a combined maximum hourly material usage rate of 0.55 gals/hr.
- (b) One (1) acid pickling operation, constructed in 1997, that uses hydrogen chloride (HCl) to remove oxide scale from wire, vented to a wet scrubber. The acid pickling operation consists of:
  - (1) One (1) patenting operation, consisting of a heat treatment process that utilizes one electric furnace and one (1) molten lead bath, with powdered lime added to form a top barrier;
  - (2) Two (2) heated HCl acid baths with a joint capacity of 500 gallons and with a combined maximum throughput of 150 gallons of virgin HCl added per day;
  - (3) Two (2) water rinse baths;
  - (4) Two (2) caustic baths for surface cleaning;
  - (5) One (1) heated zinc phosphate bath to prepare for drawing, with a wastewater pre-treatment operation;
  - (6) One (1) lime bath to help neutralize any acid remaining on the wire.
- (c) Four (4) drawing machines/lines, constructed in 1997, and one (1) drawing machine/line, approved in 2015 for construction, in which coated wire from the pickling line is run through a series of dies, which includes the maximum combined addition of 6.85 lbs/hour soap powder as a

lubricant. Vacuum hoses are connected to the line to recapture the soap powder and direct it into containers.

- (d) One (1) hardening operation, consisting of the following:
  - (1) Three (3) hardening 12-wire electric furnaces, constructed in 1997, and one (1) hardening 12-wire electric furnace, approved in 2015 for construction.
  - (2) Quench oil baths/trays servicing all four hardening lines with a combined maximum hourly material usage rate of 1.72 gals/hr.
  - (3) Four (4) lead baths, constructed in 1997, used as a cooling media and heat treat media for the wire with powdered lime added to form a top barrier.
  - (4) Rust protective oil reservoir tanks/trays servicing all four hardening lines with a combined maximum hourly material usage rate of 1.47 gals/hr.
- (e) One (1) quality-control testing operation, identified as EC Testing Operation, consisting of four (4) EC testing lines, constructed in 1997, and one (1) EC testing line, approved in 2015 for construction, utilizing spray coating with a maximum combined hourly material usage rate of 0.48 lbs/hr and a solvent with a maximum combined hourly material usage rate of 0.14 lbs/hr to remove the spray coating upon inspection completion.
- (f) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
  - (1) One (1) natural gas-fired boiler, identified as Boiler #1, with a maximum capacity of 3.35 million Btu per hour, constructed in 1997.
  - (2) One (1) natural-gas fired heater, identified as Dock Space Heater, with a maximum capacity of 2.5 million Btu per hour, constructed in 1997.
  - (3) One (1) natural-gas fired air make-up unit, identified as AMU#1, with a maximum capacity of 4.26 million Btu per hour, constructed in 1997.
  - (4) One (1) natural-gas fired air make-up unit, identified as AMU#2, with a maximum capacity of 4.95 million Btu per hour, constructed in 2000.
- (g) One metal inert gas (MIG) welding operation, constructed in 1997, with a maximum wire consumption of 0.0375 lbs wire per hour.

<b>Emission Units and Pollution Control Equipment Removed From the Source</b>
---

The source has removed the following emission units:

- (a) One (1) natural gas-fired heater, identified as Dock Space Heater, with a maximum capacity of 2.5 million Btu per hour, constructed in 1997.

**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):

Project #1

- (a) One (1) natural gas-fired furnace, identified as F01, constructed in 2000, with a maximum capacity of 0.55 MMBtu/hr, using no controls, and exhausting outdoors.
- (b) One (1) natural gas-fired space heater, identified as MH1, constructed in 2000, with a maximum capacity of 0.05 MMBtu/hr, using no controls, and exhausting outdoors.
- (c) One (1) natural gas-fired space heater, identified as ECH1, constructed in 2000, with a maximum capacity of 0.08 MMBtu/hr, using no controls, and exhausting outdoors.

These emission units are identified under 326 IAC 2-1.1-3(e)(5)(A)(i).

The emission units are identified under 326 IAC 2-1.1-3(e)(5)(A)(i) and the addition of the emission unit(s) 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 in 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.

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):

- (a) One (1) TIG welding operation, constructed in 1997, with a maximum rod consumption of 0.0375 pounds per hour, and exhausting indoors.
- (b) One (1) parts washer, using a citrus-based solvent, with a maximum capacity of 15 gallons.
- (c) One (1) natural gas-fired air makeup unit, identified as AMU#3, constructed in 2020, with a maximum heat input capacity of 5.32 MMBtu/hr.
- (d) One (1) electric induction preheat for hardening operations at the one hardening line (OH 400).
- (e) One (1) coating bath of approximately 340 gallons in size, containing a non-VOC, non-HAP containing powder, mixed with water and applied to at most 50% of the wires being prepared for drawing.
- (f) One (1) electric induction preheat to the acid pickling operation.

The total potential to emit of each project is less than levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) 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), 326 IAC 2-6.1-6, including the requirement to submit an application, do not apply to these emission units.

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

### Enforcement Issue

There are no enforcement actions pending this renewal application.

### Emission Calculations

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

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO <sub>2</sub> standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
St. Joseph County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
St. Joseph 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 hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

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

**Greenhouse Gas (GHG) Emissions**

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

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

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

	Unrestricted Potential Emissions (ton/year)								
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1,2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>3</sup>	Total HAPs
<b>Total PTE of Entire Source Excluding Fugitive Emissions*</b>	31.04	51.22	51.22	0.05	7.97	3.77	6.69	5.09	5.62
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
<b>Total PTE of Entire Source Including Source-Wide Fugitives*</b>	<b>31.04</b>	<b>51.22</b>	<b>51.22</b>	<b>0.05</b>	<b>7.97</b>	<b>3.77</b>	<b>6.69</b>	<b>5.09</b>	<b>5.62</b>
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."

<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>3</sup>Single highest source-wide HAP (Hydrochloric acid).

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

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated air pollutants is less than 100 tons per year. However, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> are each equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

**Potential to Emit After Issuance**

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	<b>Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) (Uncontrolled)</b>								
	<b>PM<sup>1</sup></b>	<b>PM<sub>10</sub><sup>1</sup></b>	<b>PM<sub>2.5</sub><sup>1,2</sup></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>Single HAP<sup>3</sup></b>	<b>Total HAPs</b>
<b>Total PTE of Entire Source Excluding Fugitive Emissions*</b>	31.04	51.22	51.22	0.05	7.97	3.77	6.69	5.09	5.62
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
<b>Total PTE of Entire Source Including Source-Wide Fugitives*</b>	<b>31.04</b>	<b>51.22</b>	<b>51.22</b>	<b>0.05</b>	<b>7.97</b>	<b>3.77</b>	<b>6.69</b>	<b>5.09</b>	<b>5.62</b>
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--
Emission Offset Major Source Thresholds	---	NA	NA	NA	NA	NA	NA	--	--
<sup>1</sup> Under the Part 70 Permit program (40 CFR 70), PM <sub>10</sub> and PM <sub>2.5</sub> , not particulate matter (PM), are each considered as a "regulated air pollutant." <sup>2</sup> PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . <sup>3</sup> Single highest source-wide HAP (Hydrochloric acid). *Fugitive HAP emissions are always included in the source-wide emissions.									

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

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Federal Rule Applicability**

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

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

- (a) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT and 326 IAC 12, are not included in the permit for this source, because this source is not considered a metal coil surface coating operation, as defined in 40 CFR, Subpart TT.
- (b) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db and 326 IAC 12, are not included in

- the permit for this source, because no boiler at this source has a maximum heat input capacity that is equal to or greater than 10 MMBtu/hr.
- (c) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for this source, because no boiler at this source has a maximum heat input capacity that is equal to or greater than 10 MMBtu/hr.
  - (d) The requirements of the New Source Performance Standard for Storage Vessels for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for this source, because none of the storage vessels at this source have a maximum capacity that is greater than 75 cubic meters (75m<sup>3</sup>) for volatile organic liquids, as specified in 40 CFR 60, Subpart Kb.
  - (e) 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):**

- (f) 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 is not included in the permit for this source, since although HCl is used for the acid pickling operation, it does not meet the definition of a steel pickling plant, nor is this a source a major source of HAP emissions, as defined in Section 112 of the Clean Air Act (CAA).
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Cans, 40 CFR 63, Subpart KKKK is not included in the permit for this source, since although this source performs surface coating of metal, the source does not perform surface coating of metal cans.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM is not included in the permit for this source, since although the source performs surface coating of metal, the source does not use surface coating on any of the types of metal parts defined in 40 CFR 63.3881(a), nor is this a source a major source of HAP emissions, as defined in Section 112 of the Clean Air Act (CAA).
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR is not included in the permit for this source, although the source performs surface coating of metal, the source does not use surface coating on metal furniture, nor is this a source a major source of HAP emissions, as defined in Section 112 of the Clean Air Act (CAA).
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Furniture, 40 CFR 63, Subpart SSSS is not included in the permit for this source, since although the source performs surface coating of metal coils, the source is not a major source of HAP emissions, as defined in Section 112 of the Clean Air Act (CAA), and thus not subject to the requirements of 40 CFR 63, Subpart RRRR.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD is not included in the permit for this source, since although the source does have a boiler on-site, the boiler has a maximum heat input capacity that is less than ten (10) MMBtu/hr, thus NESHAP DDDDD is not applicable to the boiler at this source.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Hydrochloric Acid Production, 40 CFR 63, Subpart NNNNN is not included in the permit for this

source, because although the source performs operations involving HCl, and the source is not defined as a HCl production facility in 40 CFR 63.9075.

- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH is not included in the permit for this source, since although the source performs surface coating of metal, the source does not perform paint stripping, surface coating of motor vehicles, and/or mobile equipment.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, is not included in the permit for this source, since although the source performs surface coating of metal, the source does not use surface coating on any of the specifically-listed sources or types of operations listed in 40 CFR 63.11514(a) and 40 CFR 63.11514(b).
- (o) 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):**

- (p) 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.

<b>State Rule Applicability - Entire Source</b>
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State rule applicability for this source has been reviewed as follows:

**326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**

MSOP applicability is discussed under the Potential to Emit After Issuance section of this document.

**326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**

PSD and Emission Offset applicability is discussed under the Potential to Emit After Issuance section of this document.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

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

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

**326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd 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(2).

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

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

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

This source (located in St. Joseph County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.5-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

**326 IAC 6.8 (Particulate Matter Limitations for Lake County)**

Pursuant to 326 IAC 6.8-1-1(a), this source (located in St. Joseph County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

<b>State Rule Applicability – Individual Facilities</b>
---

State rule applicability has been reviewed as follows:

**326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)**

Pursuant to 326 IAC 6-2-1, the boiler at this source, identified as Boiler #1, is not subject to the requirements of 326 IAC 6-2-1, since this boiler is subject to a more stringent limit under 326 IAC 6.5.

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

Pursuant to 326 IAC 6-3-1(b)(14), the lead bath, lime addition, and EC Testing operations are each not subject to the requirements of 326 IAC 6-3, since each operation has the potential to emit particulate matter at a rate that is less than 0.551 pounds per hour. These operations are each subject to a more stringent limit under 326 IAC 6.5.

Pursuant to 326 IAC 6-3-1(b)(9), the welding operations at the source are each not subject to the requirements of 326 IAC 6-3-2, since each unit consumes less than 625 pounds of rod or wire per day. These welding operations are each subject to a more stringent limit under 326 IAC 6.5.

Pursuant to 326 IAC 6-3-2, the drawing operations are not subject to the requirements of 326 IAC 6-3-2, since this operation is subject to a more stringent limit under 326 IAC 6.5.

**326 IAC 6.5 PM Limitations Except Lake County**

Pursuant to 326 IAC 6.5, the acid pickling operation, lead baths, powdered lime additions, drawing operation, hardening operation, natural gas-fired units (identified as AMU#1, AMU#2, F01, MH1, EC1 Unit, AMU#3), the MIG welding station, and the TIG welding station are each subject to the requirements of 326 IAC 6.5-1-2(a). Particulate matter for each unit/operations shall not exceed 0.03 grain per dry-standard cubic foot (dscf).

Pursuant to 326 IAC 6.5-1-2(b)(3), the natural gas-fired boiler, identified as Boiler #1, is subject to the requirements of 326 IAC 6.5, and particulate matter emissions shall not exceed 0.01 grain per dry-standard cubic foot (dscf).

**326 IAC 7-1.1 Sulfur Dioxide Emission Limitations**

The emission units at this source are not subject to 326 IAC 7-1.1 because each unit has a potential to emit (or limited potential to emit) sulfur dioxide (SO<sub>2</sub>) of less than 25 tons per year or 10 pounds per hour.

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

Even though, this facility was constructed after January 1, 1980, none of the units at this source are subject to the requirements of 326 IAC 8-1-6 because each unit has an unlimited VOC potential emissions that is less than twenty-five (25) tons per year.

**326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)**

Pursuant to 326 IAC 8-2-1(c)(1)(E) the shaving, hardening, and EC Testing operations are each not subject to the requirements of 326 IAC 8-2-9 because each unit uses coatings that have a VOC content that is less than 3.5 pounds VOC per gallon, and all coatings are compliant coatings for VOC as part of the above-listed operations.

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

The requirements of 326 IAC 9-1 do not apply to the units at 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.

**326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)**

The requirements of 326 IAC 10-3 do not apply to the units at this source, since this source does not include a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

**Compliance Determination and Monitoring Requirements:**

There are no compliance requirements applicable to this source.

**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 August 26, 2020.

The operation of this spring wire manufacturing operation shall be subject to the conditions of the attached proposed MSOP Renewal No. M141-43105-00558.

The staff recommends to the Commissioner that the MSOP Renewal be approved.

**IDEM Contact**

- (a) If you have any questions regarding this permit, please contact Travis Flock, 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) 233-1782 or (800) 451-6027, and ask for Travis Flock or (317) 233-1782.
- (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: Emission Calculations  
PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimitz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

Uncontrolled Potential to Emit (tons/yr)										
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP	Single HAP Name	Total HAPs
Shaving	0.00E+00	0.00E+00	0.00E+00	--	--	1.54	--	--	--	--
Lead Baths	0.56	0.56	0.56	--	--	--	--	0.01	Lead	0.01
Lime Addition	0.01	0.01	0.01	--	--	--	--	--	--	--
Acid Pickling	--	--	--	--	--	--	--	5.09	Hydrochloric acid	5.09
Drawing	29.70	29.70	29.70	--	--	--	--	--	--	--
Hardening	0.00	20.33	20.33	--	--	0.38	--	--	--	--
EC Testing	0.62	0.62	0.62	--	--	1.41	--	0.37	Methanol	0.37
Welding	7.60E-04	7.60E-04	7.60E-04	--	--	--	--	3.23E-05	Nickel	3.23E-05
Combustion	0.15	0.00	0.00	0.05	7.97	0.44	6.69	0.14	Hexane	0.15
<b>Total</b>	<b>31.04</b>	<b>51.22</b>	<b>51.22</b>	<b>0.05</b>	<b>7.97</b>	<b>3.77</b>	<b>6.69</b>	<b>5.09</b>	<b>Hydrochloric acid</b>	<b>5.62</b>

\* PM2.5 listed is direct PM2.5  
 PM2.5 = PM10

Potential to Emit after Issuance (tons/yr)										
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP	Single HAP Name	Total HAPs
Shaving	0.00E+00	0.00E+00	0.00E+00	--	--	1.54	--	--	--	--
Lead Baths	0.56	0.56	0.56	--	--	--	--	0.01	Lead	0.01
Lime Addition	0.01	0.01	0.01	--	--	--	--	--	--	--
Acid Pickling	--	--	--	--	--	--	--	5.09	Hydrochloric acid	5.09
Drawing	29.70	29.70	29.70	--	--	--	--	--	--	--
Hardening	0.00E+00	20.33	20.33	--	--	0.38	--	--	--	--
EC Testing	0.62	0.62	0.62	--	--	1.41	--	0.37	Methanol	0.37
Welding	7.60E-04	7.60E-04	7.60E-04	--	--	--	--	0.00	Nickel	3.23E-05
Combustion	0.15	0.00	0.00	0.05	7.97	0.44	6.69	0.14	Hexane	0.15
<b>Total</b>	<b>31.04</b>	<b>51.22</b>	<b>51.22</b>	<b>0.05</b>	<b>7.97</b>	<b>3.77</b>	<b>6.69</b>	<b>5.09</b>		
								<b>Highest Single HAP:</b>	<b>Hydrochloric acid</b>	

\* PM2.5 listed is direct PM2.5  
 PM2.5 = PM10

**Appendix A: Emission Calculations  
Exempt Unit PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimitz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

Year	Unit ID	Pollutant								
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	Single HAP	Total HAP
1997	TIG Welding	5.82E-04	5.82E-04	5.82E-04	-	-	-	-	2.85E-05	2.97E-05
	<b>Total:</b>	<b>5.82E-04</b>	<b>5.82E-04</b>	<b>5.82E-04</b>	-	-	-	-	<b>2.85E-05</b>	<b>2.97E-05</b>
2000	F01	4.49 E-03	0.02	0.02	1.42 E-03	0.24	0.01	0.2	4.25 E-03	4.46 E-03
2000	MH1	4.08 E-04	1.63 E-03	1.63 E-03	1.29 E-04	0.02	1.18 E-03	0.02	3.86E-04	
2000	ECH1	6.53E-04	2.61E-03	2.61E-03	2.06E-04	3.00E-02	1.89E-03	3.00E-02	6.18E-04	6.48E-04
	<b>Total:</b>	<b>0.01</b>	<b>0.02</b>	<b>0.02</b>	<b>1.75E-03</b>	<b>0.29</b>	<b>0.02</b>	<b>0.25</b>	<b>0.01</b>	<b>0.01</b>
2020	Parts Washer	-	-	-	-	-	0.00	-	-	-
2020	AMU#3	4.00E-02	0.17	0.17	0.01	2.28	0.13	1.92	0.04	0.04
2020	OH 400	-	-	-	-	-	-	-	-	-
2020	Coating bath	-	-	-	-	-	-	-	-	-
2020	Electric induction preheat	-	-	-	-	-	-	-	-	-
	<b>Total:</b>	<b>4.00E-02</b>	<b>0.17</b>	<b>0.17</b>	<b>0.01</b>	<b>2.28</b>	<b>0.13</b>	<b>1.92</b>	<b>0.04</b>	<b>0.04</b>

Suzuki Garphyttan  
PM and VOC Emissions  
Shaving Operations  
**Appendix A: Emission Calculations**  
**Shaving Operation PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimtz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

**Shaving Operation**

Material	Density (lb/gal)	Weight % Organics	VOC Content (lbs/gal)	Potential Annual Material Usage (gals/yr)	Maximum Hourly Material Usage (gals/hr)	Maximum Annual Material Usage (gals/yr)	PTE VOC Emissions (lbs/day)	PTE VOC Emissions (tons/yr)	PTE PM/PM10/PM2.5 Emissions (tons/yr)	Transfer Efficiency
Houghton Cut Max TPO-32 Oil	7.3392	0.07%	0.50	4,118.00	0.71	6,177.00	8.46	1.54	0.00E+00	100.00%

**Notes:**

Facility utilizes Houghton Cut Max TPO-32 as the lubricating oil in the shaving process, which consists of two shaving machines. The shaving machines are used to reduce the diameter of the wire. The shaving debris, which consists of used oil and small metal shavings, is collected and sent off-site for disposal and recycling.

The purpose of the oil is to lubricate the hard shaved wire rod in contact with the large steel block which supplies the force to pull the rod through the shaving die.

The wire passes through the lubricating oil and is therefore assumed to have a 100% transfer efficiency.

Typical Annual Material Usage is the highest annual purchase quantities of this material over the last five year period.

Maximum Annual Material Usage is the typical annual material usage increased by 50% to reflect an estimated true maximum annual material usage.

The lubricating oil does not contain any HAP components.

The SDS for the material indicates up to 100% mineral oil content but does not provide a VOC content. Due to the lack of VOC in a very similar material, the Houghto-Quench (as used in the Hardening process), with only 6g/L VOC per SDS determined by testing, we are conservatively estimating that this material contains 60g/L although based upon constituents it is most likely to contain less than 6g/L.

**Throughput:**

Potential Annual Material Usage is the average of the two highest annual purchase quantities of this material over the last five year period.

Source operates around the clock 365 days a year

Maximum Hourly Material Usage = Maximum Annual Material Usage\*1 yr/365 days\*1 day/24 hours

Maximum Annual Material Usage is the potential annual material usage multiplied by a conservative factor of 1.5.

The lubricating oil does not contain any HAP components.

The MSDS for the material indicates up to 100% mineral oil content but does not provide a VOC content. Therefore, a 100% VOC content is assumed to be conservative, as well as all VOC is assumed to be actually emitted to air from the use of the oil.

**Methodology:**

VOC Content (lbs/gal) = Density (lbs/gal) x Weight % Organics

Potential VOC Emissions (lbs/day) = Maximum Annual Material Usage (gals/yr) x VOC Content (lbs/gal) x (1 yr/365 days)

Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lbs/day) x (365 days/yr) x (1 ton/2000 lbs)

Potential PM/PM10/PM2.5 Emissions (tons/yr) = Maximum Annual Material Usage (gals/yr) x Density (lbs/gal) x (1- Weight % Organics) x (1- Transfer Efficiency %) x (1 ton/2000 lbs)

**Appendix A: Emission Calculations  
 Lead Baths PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimitz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

**Lead Baths**

Material	Potential Annual Material Usage (lbs/yr)	Maximum Hourly Material Usage (lbs/hr)	Maximum Annual Material Usage (lbs/yr)	Maximum Annual Material Usage (tons/yr)	PM/PM10/PM2.5 Emission Factor (lbs/ton)	Lead Emission Factor (lbs/ton)	PTE PM/PM10/PM2.5 Emissions (tons/yr)	PTE Lead Emissions (tons/yr)
Lead Billets	149,574	25.61	224,361	112.18	10.00	0.20	0.56	0.01

**Notes:**

Facility utilizes one molten lead bath in the patenting operation (the first step in the acid pickling line) and four molten lead baths in the hardening operation (four hardening lines, each with their own dedicated lead bath). The molten lead baths act as a cooling media for the wire and as a heat treat media. Lead billets are added to the baths periodically, and electric coils under the baths provide heat to melt the lead. Although the vast majority of lead is removed from the bath as scrap and sent off-site for reclamation, a small quantity of the lead is lost from the baths as a fugitive emission.

**Throughput:**

Potential Annual Material Usage is the average of the two highest annual purchase quantities of this material over the last five year period.

Source operates around the clock 365 days a year

Maximum Hourly Material Usage = Maximum Annual Material Usage\*1 yr/365 days\*1 day/24 hours

Maximum Annual Material Usage is the potential annual material usage of lead billets between all five lead baths combined multiplied by a conservative factor of 1.5.

PM10 emission factor is derived from FIRE version 6.25, SCC# 30400413. Assume all PM/PM2.5 is equivalent to PM10.

Lead emission factor is derived from Table 12.11-4 from AP-42, Chapter 12.11 smelting.

**Methodology:**

Maximum Annual Material Usage (tons/yr) = Maximum Annual Material Usage (lbs/yr) x (1 ton/2000 lbs)

Potential PM/PM10/PM2.5 Emissions (tons/yr) = Maximum Annual Material Usage (tons/yr) x Emission Factor (lb/ton) x (1 ton/2000 lbs)

Potential Lead Emissions (tons/yr) = Maximum Annual Material Usage (tons/yr) x Emission Factor (lb/ton) x (1 ton/2000 lbs)

Suzuki Garphyttan  
PM Emissions  
Powdered Lime Addition Operations

**Appendix A: Emission Calculations  
Lime Addition PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimitz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

**Lime Addition**

Material	Potential Annual Material Usage (lbs/yr)	Maximum Hourly Material Usage (lbs/hr)	Maximum Annual Material Usage (lbs/yr)	Maximum Annual Material Usage (tons/yr)	PM/PM10/PM2.5 Emission Factor (lbs/ton)	PTE PM/PM10/PM2.5 Emissions (tons/yr)
Powdered Lime	7,500	1.28	11,250	5.63	2.20	0.006

**Notes:**

Facility utilizes powdered lime to add to the five (5) molten lead baths in the patenting and hardening operations. The powdered lime forms a protective barrier on top of the baths to prevent heat from escaping. The hardened lime is removed from the top of the baths regularly by a process called "slagging". The hardened lime removed during this process is sent off-site for disposal. The addition of powdered lime to the baths using a bucket scoop results in the generation of PM emissions. The facility has implemented a SOP for lime addition to reduce PM emissions generated.

**Throughput:**

Potential Annual Material Usage is the average of the two highest annual purchase quantities of this material over the last five year period.  
Source operates around the clock 365 days a year  
Maximum Hourly Material Usage = Maximum Annual Material Usage\*1 yr/365 days\*1 day/24 hours  
Maximum Annual Material Usage is the potential annual material usage of powdered lime between all five lead baths combined multiplied by a conservative factor of 1.5.  
PM Emissions from lime addition have been conservatively estimated using lime handling emission factors. According to AP-42, Chapter 11.17-Lime Manufacturing (2/98), the PM/PM10 emission factors of lime handling are from the Table 11.1704 - Product transfer and conveying (SCC 3-05-016-15).  
Assume all PM is equivalent to PM10/PM2.5.

**Methodology:**

Maximum Annual Material Usage (tons/yr) = Maximum Annual Material Usage (lbs/yr) x (1 ton/2000 lbs)  
Potential PM/PM10/PM2.5 Emissions (tons/yr) = Maximum Annual Material Usage (tons/yr) x Emission Factor (lb/ton) x (1 ton/2000 lbs)

Suzuki Garphyttan  
HAP Emissions  
Acid Pickling Operations  
**Appendix A: Emission Calculations**  
**HCL Baths PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimitz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

**HCL Baths**

Material	Density of HCl (lb/gal)	Weight Percent HCl (%)	Weight Percent of Make-Up Solution Lost (%)	Maximum Daily Acid Make-Up Rate (gals/day)	Maximum Annual Acid Pickling Throughput (gals/yr)	PTE HCl Emissions (tons/yr)
HCl	9.84	31.50%	6.00%	150.00	54,750.00	5.09

**Notes:**

Facility utilizes two pickling baths using HCl in the acid pickling line after the patenting operation. Steel wire passes through the acid pickling baths where the HCl solution removes oxide scale from the surface of the wire. The oxide scale forms on the surface of the steel wire when it cools from a molten state after the patenting process. Due to evaporation loss of HCl from the baths and carry-over on the wire exiting the baths, there is a need to recharge the baths on a regular basis by adding virgin HCl. The HCl is not diluted with water.  
The density and weight composition of the HCl solution were obtained from MSDS data.

**Throughput:**

Potential Daily Acid Make-Up Rate of 100 gals/day is based upon the average make-up rate over the last five years of production.

Source operates around the clock 365 days a year

Maximum Daily Acid Make-Up Rate is the potential daily acid make-up rate of 100 gals/day multiplied by a conservative factor of 1.5.

Maximum potential HCl emissions are based upon the amount of make-up acid solution added to the baths, the estimated weight percent of make-up solution lost from the baths (which is an engineering estimate and estimated as the worst-case value based upon other acid pickling line permits issued by IDEM), and the weight % of HCl in the make-up acid solution. This is overly conservative since most of the make-up solution is lost due to drag-out/bleed-off and not to evaporation as an air emission.

The pickling line is vented to a wet scrubber.

**Methodology:**

Maximum Annual Acid Pickling Throughput (i.e., Maximum Annual Acid Make-Up Rate) (gals/yr) = (150 gals/day) x (365 days/yr)

Potential HCl emissions (tons/yr) = Maximum Annual Acid Pickling Throughput (gals/yr) x Density (lbs/gal) x Weight Percent HCl (%) x Weight Percent of Solution Lost (%) x (1 ton/2000 lbs)

Suzuki Garphyttan  
PM Emissions  
Drawing (Soap Powder Addition) Operations

**Appendix A: Emission Calculations  
Drawing Operation PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimitz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

**Drawing Operation**

Material	Estimated Annual Material Usage (lbs/yr)	Maximum Hourly Material Usage (lbs/hr)	Maximum Annual Material Usage (lbs/yr)	Maximum Annual Material Usage (tons/yr)	Maximum Annual Material Captured (tons/yr)	Control Efficiency of Vacuum Hoses (%)	Amount of Material Remaining on Wire Leaving Process (%)	PTE PM/PM10/PM2.5 Emissions Before Control (tons/yr)	PTE PM/PM10/PM2.5 Emissions After Control (tons/yr)
Traxit GT 45B Soap Powder	40,000	6.85	60,000	30.00	24.00	80.00%	1.00%	29.70	5.64

**Notes:**

Facility utilizes Traxit GT 45B as the main soap powder in the drawing process. Other soap powders could be used in smaller amounts, but they are all essentially the same product (calcium stearate). The soap powder acts as an additional lubricant as the wire is drawn through a series of dies. The facility utilizes five drawing lines which shape or stretch the wire as needed. The metal wire is drawn through a series of dies in successfully decreasing diameter until the desired gauge size is reached. Vacuum systems are used to capture the soap powder used on the drawing lines. There is a vacuum hose in close proximity to every die box exit (i.e., the point where the wire leaves the draw dies) to collect excess soap powder and send it back to a general collection area to keep it off the drawing equipment and from spilling onto the floor. The vacuum system can also be used to capture soap powder during routine clean-up of the drawing machines. The soap powder collected in the vacuum systems is transported to closed fiber drums which are sent off-site for disposal.

**Throughput:**

Expected Annual Material Usage is the expected actual future usage of material based upon future growth projections.

Source operates around the clock 365 days a year

Maximum Hourly Material Usage = Maximum Annual Material Usage\*1 yr/365 days\*1 day/24 hours

Maximum Annual Material Usage is the potential annual material usage multiplied by a conservative factor of 1.5.

Facility conservatively estimates that 80% of the soap powder used is captured in the vacuum systems and directed to the closed fiber drums. This estimate has been substantiated by measurements of the amount of collected soap powder sent off-site for disposal. Of the total amount of soap powder used in the drawing process, the facility conservatively estimates that a maximum of 1% always stays on the wire as it passes on to the following hardening operation (where it will be captured in the oil quench bath). Some soap powder must stay on the wire as it leaves the drawing process to act as a lubricant as the wire enters the hardening operation where the wire passes through one of the four 12-wire electric furnaces to be heated.

Potential PM/PM10/PM2.5 emissions is equivalent to the maximum annual soap powder usage (not taking into account the control efficiency of the vacuum hoses), minus the 1% that stays on the wire throughout this process (and therefore can never become an air emission).

Assume all PM is equivalent to PM10/PM2.5.

**Methodology:**

Maximum Annual Material Usage (tons/yr) = Maximum Annual Material Usage (lbs/yr) x (1 ton/2000 lbs)

Maximum Annual Material Captured (tons/yr) = Maximum Annual Material Usage (tons/yr) x Control Efficiency of Vacuum Hoses

Potential PM/PM10/PM2.5 Emissions Before Control (tons/yr) = [Maximum Annual Material Captured (tons/yr) x (1/Control Efficiency of Vacuum Hoses %)] - [(Maximum Annual Material Usage (tons/yr) x (Amount of Material Remaining on Wire Leaving Process %))]

Potential PM/PM10/PM2.5 Emissions After Control (tons/yr) = [Potential PM/PM10/PM2.5 Emissions Before Control (tons/yr) x (1-Control Efficiency of Vacuum Hoses)] - [(Maximum Annual Material Usage (tons/yr) x (Amount of Material Remaining on Wire Leaving Process %))]

Suzuki Garphyttan  
PM and VOC Emissions  
Hardening Operations

**Appendix A: Emission Calculations  
Hardening Operation PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimitz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

**Hardening Operation**

Material	Density (lb/gal)	Weight % Organics	VOC Content (lbs/gal)	Potential Annual Material Usage (gals/yr)	Maximum Hourly Material Usage (gals/hr)	Maximum Annual Material Usage (gals/yr)	PTE VOC Emissions (lbs/day)	PTE VOC Emissions (tons/yr)	PTE PM/PM10/PM2.5 Emissions(tons/yr)	Transfer Efficiency
Houghto-Quench 105	7.25	0.01%	0.05	10,065.00	1.72	15,097.50	2.07E+00	0.38	0.00E+00	100.00%
Protect-It 165	6.50	0.00%	0.00	17,820.00	3.05	26,730.00	0.00E+00	0.00E+00	0.00E+00	100.00%
PicoGuard 6240	7.50	0.00%	0.00	1,800.00	0.31	2,700.00	0.00	0.00	0.00E+00	100.00%
<b>Totals</b>								<b>0.38</b>	<b>0.00E+00</b>	

**Notes:**

Facility utilizes Houghto-Quench 105 as the quench oil in the hardening process, which consists of four hardening lines. The hardening process, which is used to increase the hardness of the steel wire, consists of a heating and quenching cycle. The wire passes through one of four 12-wire electric furnaces to be heated and then subsequently into a quench oil bath for tempering.

Facility also utilizes Protect-It 165 and PicoGuard 6240 as the rust preventative solutions in the hardening process. After the wire exits the quench oil bath, it passes through a molten lead bath (the lead emissions are already accounted for under the "Lead Baths" spreadsheet) and a water bath for cooling purposes before it enters another bath containing the rust preventative solutions.

The wire passes through the quench oil bath and the rust preventative bath, which are therefore assumed to have a 100% transfer efficiency.

**Throughput:**

Potential Annual Material Usage is the average of the two highest annual purchase quantities of these materials over the last five year period.

Source operates around the clock 365 days a year

Maximum Hourly Material Usage = Maximum Annual Material Usage\*1 yr/365 days\*1 day/24 hours

Maximum Annual Material Usage is the potential annual material usage multiplied by a conservative factor of 1.5.

The quench oil does not contain any VOC or HAP components per the MSDS.

The Protect-It 165 rust preventative solution does not contain any VOC or HAP components per the MSDS.

The PicoGuard 6240 rust preventative solution does not have a VOC content determined per the MSDS.

**Methodology:**

VOC Content (lbs/gal) = Density (lbs/gal) x Weight % Organics

Potential VOC Emissions (lbs/day) = Maximum Annual Material Usage (gals/yr) x VOC Content (lbs/gal) x (1 yr/365 days)

Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lbs/day) x (365 days/yr) x (1 ton/2000 lbs)

Potential PM/PM10/PM2.5 Emissions (tons/yr) = Maximum Annual Material Usage (gals/yr) x Density (lbs/gal) x (1- Weight % Organics) x (1 - Transfer Efficiency %) x (1 ton/2000 lbs)

Suzuki Garphyttan  
Oily Smoke and Mist (PM10) Emissions  
Hardening Operations  
**Appendix A: Emission Calculations**  
**Hardening Operation Oily Smoke and Mist PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimtz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

**Hardening Operation Oily Smoke and Mist**

Material	Maximum PM10 Emission Concentration (mg/m <sup>3</sup> )	Exhaust Fan Flow Rate (ft <sup>3</sup> /min)	PTE PM10/PM2.5 Emissions (lbs/day)	PTE PM10/PM2.5 Emissions (tons/yr)
Oily Smoke and Mist	40.0	31,045.0	111.40	20.33
			<b>Totals</b>	<b>20.33</b>

**Notes:**

Facility utilizes a hardening process, which is used to increase the hardness of the steel wire. This process consists of a heating and quenching cycle. The process produces intermittent oily smoke and mist which is exhausted to atmosphere via general exhaust fans in the roof above the four hardening lines.

Based upon research into industrial air quality monitoring for heat treating processes, smoke and mist can approach 40 mg/m<sup>3</sup> of sub-micron emissions. This is considered the worst-case scenario for the facility since the smoke and oil mist emissions are light and intermittent based upon visual observation across the entire hardening process (all four hardening lines).

Assume all sub-micron emissions are PM10 emissions. Assume PM10 = PM2.5

Exhaust fan flow rate for each fan is 31,045 ft<sup>3</sup>/min. There are 6 total exhaust fans in this area.

PM10 emissions are assumed to be generated from this hardening process as a whole, and the emissions would simply be spread out among the 6 various fans.

**Methodology:**

Potential PM10/PM2.5 Emissions (lbs/day) = Maximum PM10 Emission Concentration (mg/m<sup>3</sup>) x Flow Rate (ft<sup>3</sup>/min) x (60 min/hr) x (24 hr/day) x 0.000022 lb/mg x 1 m<sup>3</sup>/35.3146667 ft<sup>3</sup>

Potential PM10/PM2.5 Emissions (tons/yr) = Potential PM10 Emissions (lbs/day) x (365 days/yr) x (1 ton/2000 lbs)

**Appendix A: Emission Calculations  
EC Testing PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimtz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

**Spray Paint**

Material	Density (lb/gal)	Weight % Organics	VOC Content (lbs/gal)	Potential Annual Material Usage (lbs/yr)	Maximum Hourly Material Usage (lbs/hr)	Maximum Annual Material Usage (lbs/yr)	Maximum Annual Material Usage (tons/yr)	PTE VOC Emissions (lbs/day)	PTE VOC Emissions (tons/yr)	PTE PM/PM10/PM2.5 Emissions(tons/yr)	Transfer Efficiency (%)
Quest Bright Yellow	5.9214	67.04%	3.97	2,805.00	0.48	4,207.50	2.10	7.73	1.41	0.62	10.00%
								<b>Totals</b>	<b>1.41</b>	<b>0.62</b>	

**Cleaning Solvents**

Material	Density (lb/gal)	Weight % Organics	VOC Content (lbs/gal)	Potential Annual Material Usage (lbs/yr)	Maximum Hourly Material Usage (lbs/hr)	Maximum Annual Material Usage (lbs/yr)	Maximum Annual Material Usage (tons/yr)	PTE VOC Emissions (lbs/day)	PTE VOC Emissions (tons/yr)	PTE PM/PM10/PM2.5 Emissions(tons/yr)	Transfer Efficiency (%)	Weight % Methanol	Weight % Toluene
Master Non-Chlorinated Brake Cleaner	6.8388	45.00%	3.08	825.00	0.14	1,237.50	0.62	1.53	0.28	0.31	10.00%	30.00%	10.00%

**Notes:**

Facility utilizes Rust Spray Enamel, Gloss White as the white spray paint in the Eddy Current (EC) Test process, which consists of five testing lines. The EC Test process uses white spray paint to identify potential defects in the wire for future inspection as part of the QA/QC process.

The paint is manually sprayed on the wire from 12 ounce spray cans. Facility also utilizes Master Bellman Brake Cleaner to clean paint off wire samples to inspect the surface in EC Test process. This cleaning solvent is sprayed from 14 ounce spray cans. The gloss white spray paint and brake cleaner solvent are assumed to only have a 10% transfer efficiency since the materials are manually sprayed onto wire with such a small diameter.

**Throughput:**

Potential Annual Material Usage is the average of the two highest annual purchase quantities of these materials over the last five year period.

Source operates around the clock 365 days a year

Maximum Hourly Material Usage = Maximum Annual Material Usage\*1 yr/365 days\*1 day/24 hours

Maximum Annual Material Usage is the potential annual material usage multiplied by a conservative factor of 1.5.

Overspray of spray paint is assumed to be PM/PM10/PM2.5 emissions.

The VOC contents obtained from the material MSDSs.

**Methodology:**

VOC Content (lbs/gal) = Density (lbs/gal) x Weight % Organics

Maximum Annual Material Usage (tons/yr) = Maximum Annual Material Usage (lbs/yr) x (1 ton/2000 lbs)

Potential VOC Emissions (lbs/day) = Maximum Annual Material Usage (lbs/yr) x Weight % Organics x (1 yr/365 days)

Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lbs/day) x (365 days/yr) x (1 ton/2000 lbs)

Potential PM/PM10/PM2.5 Emissions (tons/yr) = Maximum Annual Material Usage (tons/yr) x (1 - Weight % Organics) x (1 - Transfer Efficiency %)

**Appendix A: Emission Calculations  
EC Testing PTE Summary**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimitz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

**Spray Paint**

Material	Density (lb/gal)	Weight % Organics	VOC Content (lbs/gal)	Potential Annual Material Usage (lbs/yr)	Maximum Hourly Material Usage (lbs/hr)	Maximum Annual Material Usage (lbs/yr)	Maximum Annual Material Usage (tons/yr)	Transfer Efficiency (%)	Weight % HAP
Quest Bright Yellow	5.9214	67.04%	3.97	2,805.00	0.48	4,207.50	2.10	10.00%	0.00%
								<b>Total HAPs (tons/year):</b>	<b>0.00</b>

**Cleaning Solvents**

Material	Density (lb/gal)	Weight % Organics	VOC Content (lbs/gal)	Potential Annual Material Usage (lbs/yr)	Maximum Hourly Material Usage (lbs/hr)	Maximum Annual Material Usage (lbs/yr)	Maximum Annual Material Usage (tons/yr)	Transfer Efficiency (%)	Weight % Methanol	Weight % Toluene
Master Non-Chlorinated Brake Cleaners	6.8388	45.00%	3.08	825.00	0.14	1,237.50	0.62	10.00%	30.00%	30.00%
								<b>Single HAPs (tons/year):</b>	<b>0.19</b>	<b>0.19</b>
								<b>Total HAPs:</b>	<b>0.37</b>	

**Notes:**

Facility utilizes Rust Spray Enamel, Gloss White as the white spray paint in the Eddy Current (EC) Test process, which consists of five testing lines. The EC Test process uses white spray paint to identify potential defects in the wire for future inspection as part of the QA/QC process.  
The paint is manually sprayed on the wire from 12 ounce spray cans. Facility also utilizes Master Bellman Brake Cleaner to clean paint off wire samples to inspect the surface in EC Test process. This cleaning solvent is sprayed from 14 ounce spray cans. The gloss white spray paint and brake cleaner solvent are assumed to only have a 10% transfer efficiency since the materials are manually sprayed onto wire with such a small diameter.

**Throughput:**

Potential Annual Material Usage is the average of the two highest annual purchase quantities of these materials over the last five year period.  
Source operates around the clock 365 days a year  
Maximum Hourly Material Usage = Maximum Annual Material Usage\*1 yr/365 days\*1 day/24 hours  
Maximum Annual Material Usage is the potential annual material usage multiplied by a conservative factor of 1.5.  
The HAP contents obtained from the material MSDSs.

**Methodology:**

Maximum Annual Material Usage (tons/yr) = Maximum Annual Material Usage (lbs/yr) x (1 ton/2000 lbs)  
Potential HAP Emissions (lbs/day) = Maximum Annual Material Usage (lbs/yr) x Weight % HAP x (1 yr/365 days)  
Potential HAP Emissions (tons/yr) = Potential HAP Emissions (lbs/day) x (365 days/yr) x (1 ton/2000 lbs)

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimtz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	1	0.04	0.02445211	0.00034497	N/A	0.00001	9.78E-04	1.38E-05	0.00E+00	4.00E-07	1.42E-05
TIG	1	0.04	0.0182	0.000039	0.00089	N/A	3.19E-03	6.83E-06	1.56E-04	0.00E+00	1.63E-04
<b>EMISSION TOTALS</b>											
Potential Emissions lbs/hr							4.17E-03	2.06E-05	1.56E-04	4.00E-07	1.77E-04
Potential Emissions lbs/day							1.00E-01	4.95E-04	3.74E-03	9.60E-06	4.25E-03
<b>Potential Emissions tons/year</b>							<b>7.60E-04</b>	<b>3.77E-06</b>	<b>2.85E-05</b>	<b>7.30E-08</b>	<b>3.23E-05</b>

**Methodology:**

MIG welding emission factors are from AP 42, Chapter 12-19, Tables 12-19.1 and 12-19.2 (SCC 3-09-052-26) January 1995.  
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)  
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day  
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimtz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

Emission Unit	Maximum Annual Solvent Usage (gal/yr)*	Solvent Specific Gravity	Solvent Density (lbs/gal)	VOC Content (%)	VOC Potential (tpy)	HAP Content (%)	HAP Potential (tpy)
Parts washer	60	1	8.34	1.70%	0.00	0.0%	0.00
<b>TOTAL</b>					<b>0.00</b>		<b>0.00</b>

**Description**

\*The facility has 1 parts washer of approximately 15 gallon capacity which uses Ozzy Juice citrus based solvent. It is assumed worst case that it is serviced quarterly.

**Methodology**

Maximum Annual Solvent Usage (gal/yr) = maximum capacity \* 4 service calls/year

Product density (lb/gal) = Specific Gravity \* 8.34 lb/gal

Density (lbs/gal) = as supplied by SDS

Volatile Content (%) = as supplied by SDS

VOC Potential (tpy) = Maximum Annual Solvent Usage (gal/yr) \* Solvent Density (lbs/gal) \* Volatile Content (%) / 2,000 lbs per ton

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

**Company Name:** Suzuki Garphyttan Corporation  
**Address City IN Zip:** 4404 Nimitz Parkway, South Bend, Indiana 46628  
**Permit No:** M141-43198-00558  
**Reviewer:** Travis Flock

Unit ID	MMBtu/hr
Boiler #1	3.35
AMU#1	4.26
AMU#2	4.95
F01	0.55
MH1	0.05
EC1 Unit	0.08
AMU#3	5.32
<b>Total:</b>	<b>18.56</b>

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
18.6	1020	159.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.15	0.00	0.00	0.05	7.97	0.44	6.69

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

PM2.5 emission factor is filterable and condensable PM2.5 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 Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.67E-04	9.56E-05	5.98E-03	0.14	2.71E-04	<b>0.15</b>

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.0E-05	8.8E-05	1.1E-04	3.0E-05	1.7E-04	<b>4.4E-04</b>
						<b>Total HAPs</b>
						<b>0.15</b>
						<b>Worst HAP</b>
						<b>0.14</b>

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.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

October 15, 2020

Terry Miller  
Suzuki Garphyttan Corporation  
4404 Nimitz Parkway  
South Bend, IN 46628

Re: Public Notice  
Suzuki Garphyttan Corporation  
Permit Level: MSOP – Renewal  
Permit Number: 141-43198-00558

Dear Mr. Terry Miller:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at:**

**IDEM's online searchable database:** <http://www.in.gov/apps/idem/caats/> . Choose Search Option by **Permit Number**, then enter permit 43198

and

**IDEM's Virtual File Cabinet (VFC):** <http://www.IN.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

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 St. Joseph County Public Library, 304 South Main Street in South Bend, IN 46601. 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 draft permit 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 Travis Flock, 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 3-1782 or dial (317) 233-1782.

Sincerely,

*Kathy Bourquein*

Kathy Bourquein  
Permits Branch  
Office of Air Quality

Enclosures

PN Applicant Cover Letter access via website 8/10/2020



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
*Governor*

**Bruno L. Pigott**  
*Commissioner*

October 15, 2020

To: St. Joseph County Public Library

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

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

**Applicant Name: Suzuki Garphyttan Corporation**  
**Permit Number: 141-43198-00558**

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 Smiddie-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



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**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

## Notice of Public Comment

October 15, 2020

**Suzuki Garphyttan Corporation**  
**141-43198-00558**

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 Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at [JBRUSH@IDEM.IN.GOV](mailto:JBRUSH@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 2/28/2020

# Mail Code 61-53

IDEM Staff	KBOURQUE October 15, 2020 Suzuki Garphyttan Corporation 141-43198-00558 (draft)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Terry Miller Suzuki Garphyttan Corporation 4404 Nimitz Pkwy South Bend IN 46628 (Source CAATS)										
2		Mishawaka City Council and Mayors Office 600 E. 3rd Street Mishawaka City Hall Mishawaka IN 46546 (Local Official)										
3		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)										
4		South Bend City Council / Mayors Office 227 W. Jefferson Blvd. South Bend IN 46601 (Local Official)										
5		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)										
6		Mark Espich St. Joseph County Health Department 227 W Jefferson Blvd South Bend IN 46601 (Health Department)										
7		St. Joseph County Public Library 304 S Main St South Bend IN 46601 (Library)										
8		Ms. Andrea Swanson-Loop Cornerstone Environmental 880 Lennox Ct Zionsville IN 46077 (Consultant)										
9		Jeff Mayes News-Dispatch 422 Franklin St Michigan City IN 46360 (Affected Party)										
10		Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)										
11												
12												
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