



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 1, 2024

VIA ELECTRONIC MAIL

Thomas Sholty
NTK Precision Axle Corporation
1600 E Bishop Ct
Mount Prospect, Illinois, 60056
safety@NTKaxle.com

Re: Inspection Summary Letter
NTK Precision Axle Corporation
Source ID 023-00038
Frankfort, Clinton County

Dear Thomas Sholty:

On June 25, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of NTK Precision Axle Corporation, located at 741 S CR 200 W in Frankfort, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment
Inspection Results: No violations were observed

Please direct any questions to me at 317-741-7873 or by email at NWeston@idem.in.gov.

Sincerely,

Noah Weston, Compliance Inspector
Compliance Section 1
Office of Air Quality

ACES ID: 298731

ENCLOSURE: Inspection Summary Report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**



SOURCE INFORMATION	
SOURCE NAME	NTK Precision Axle Corporation
SOURCE LOCATION	741 S CR 200 W, Frankfort, Indiana Clinton County
MAILING ADDRESS	1600 E Bishop Ct, Mount Prospect, Illinois, 60056
PLANT ID	023-00038
<u>PERMIT INFORMATION</u>	Permit Type: MSOP Permit Number: M023-46786-00038 Permit Expiration Date: 6/4/2029 VFC Document No.(hyperlink): 83514992
ATTAINMENT STATUS	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input type="checkbox"/> O ₃ <input type="checkbox"/> NO ₂ <input type="checkbox"/> Pb <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5}
SOURCE STATUS	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	The Permittee owns and operates a stationary-automotive-components manufacturing plant. The source operates three shifts Monday through Friday with weekend shifts as needed to meet production needs.

INSPECTION INFORMATION			
INSPECTED BY	Noah Weston		
INSPECTION DATE AND TIME	June 25, 2024	TIME IN: 9:00am	TIME OUT: 10:30am
REPORTED BY	Noah Weston	REPORT DATE: 6/27/2024	
<u>COMPLIANCE PERIOD REVIEWED</u>	7/7/2015 to Present		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input type="checkbox"/> Compliance Monitoring Strategy (CMS) <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Other:	<input checked="" type="checkbox"/> Commitment <input type="checkbox"/> Complaint <input type="checkbox"/> Surveillance	
ACES TRACKING NUMBER(S)	Inspection: 298731	Complaint: N/A	Violation/Warning: N/A
RM TRACKING NUMBER(S)	Complaint: N/A		
<u>INSPECTION BACKGROUND</u>	The source was last inspected in July 2015. No violations were observed. The MSOP was renewed 4-Jun-2019. The source operates three shifts Monday through Friday with weekend shifts as needed to meet production needs.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Nahomi Özen	HR & EHS Director	765-656-1024	Safety@NTKaxle.com
Thomas Sholty	Sr. EHS Specialist	765-656-1041	Safety@NTKaxle.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
Formal Enforcement Actions			
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
Other Relevant Actions			
Action Taken	Comments		

PERMIT SECTION D.1

Emission Units and Control Devices:

- (a) Metal Hub ring manufacturing operations consisting of:
- (1) Two (2) metal hub ring turning facilities (identified as EU-01 and EU-03), constructed in 2005, modified in 2011, modified in 2016 and 2020, consisting of 406 lubricant application stations, with particulates controlled via wet turning, using a maximum of 11,000 gallons of VOC-containing coating material per year.
 - (2) One (1) induction heat treatment facility (identified as EU-02), modified in 2016 and 2020, using a maximum of 11,232 gallons of VOC-containing coating material per year, and exhausting to Stacks EP-01 through 18, and EP-35 through EP-53.
 - (3) One (1) broaching facility (identified as EU-04), modified in 2016, 2020, and 2021, using a maximum of 11.146gallons of non-VOC-containing coating material per year.
 - (4) One (1) rust proofing facility (identified as EU-05), modified in 2016 and 2020, using a maximum of 15,826 gallons of VOC-containing coating material per year.

Pollutants with Emission Limits or Applicable Standards:

SO₂ NO_x CO VOC PM PM₁₀ PM_{2.5} HAPS

Applicable Rules:

- 326 IAC 8-2-9;

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards D.1.1; D.1.2	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements D.1.6	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Types of Records Reviewed: VOC content of each coating; Monthly usage of solvents.

Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Observations and Comments:

I arrived at the source at approximately 0900 where I entered through the visitor entrance. I introduced myself to the HR & Safety Director and Sr. EHS Specialist and explained the nature of the inspection. I reviewed the source's compliance records before touring the facility with the Sr. EHS Specialist.

PERMIT SECTION D.1
<p>The source complies with the emission limitations of permit condition D.1.1 by using only compliant coating. The source uses six VOC containing coatings for production and cleaning activities. The source provided vendor "as applied" VOC data upon request. The highest VOC content amongst the solvents used was 3.45 lbs/gal below the 3.5 lbs/gal limit.</p> <p>During the facility tour, I observed the metal hub ring manufacturing operations as well as the coating and solvent storage areas. All coatings, solvents, and waste materials were stored in closed containers. The Sr. EHS Specialist showed me the closed containers used to transport materials to fill individual units. The coatings are applied in enclosed units to minimize spills or release of VOC containing coatings. No spills of VOC containing materials were observed.</p> <p>The source does not use non-compliant materials. Therefore, the recordkeeping required per permit condition D.1.6(b) was not needed.</p>
Permit Section Compliance Status:
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.2		
Emission Units and Control Devices:		
(c) One (1) cold cleaner tank (identified as EU-13), with a storage capacity of 78 gallons and maximum solvent consumption of 0.50 gallons per day. This unit is used for facility maintenance purposes.		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
Applicable Rules:		
<ul style="list-style-type: none"> 326 IAC 8-3-2 		
Requirement:	Applicable	Violation Noted
Emission Limitations and Standards D.2.1; D.2.2	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan D.2.3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements D.2.4	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Records of solvent usage for cold cleaner degreasing operation, cold cleaner degreaser solvent SDS		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
<p>I reviewed the sources records for the solvent used in the cold cleaner tank. No violations were observed. The SDS provided that the true vapor pressure at 20 °C was less than 1 mmHg in compliance with 326 IAC 8-3-8 and permit condition D.2.2.</p> <p>During the facility tour, I inspected the cold cleaner tank. The lid was closed, and the unit was equipped with a label meeting the requirements of 326 IAC 8-3-2 and permit condition D.2.1(a)</p>		
Permit Section Compliance Status:		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		

ADDITIONAL SOURCE COMPLIANCE REVIEW:	
The following reports are required and were reviewed:	
<input type="checkbox"/> Annual Compliance Certification(s)	<input type="checkbox"/> Deviation & Compliance Monitoring Report(s)
<input checked="" type="checkbox"/> Annual Notification(s)	<input type="checkbox"/> Emission Statement(s)
The reports are consistent with inspection observations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
The permit accurately represents emission units observed on site.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Compliance assistance was provided during the inspection.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
The source is required to have a Risk Management Plan [40 CFR 68].	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, the source has a plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If yes, the employees have been trained.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
<u>Additional Information and Comments:</u>	
A review of the Annual Notifications submitted by the source found that all notifications were complete and submitted in a timely manner.	
Additional Source Compliance Review Status:	
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:	

INSPECTION FINDINGS	
<input checked="" type="checkbox"/> No violations were observed or determined at the time of the inspection. <input type="checkbox"/> The following violations were determined at the time of the inspection:	
RECOMMENDED ACTION	Issue inspection summary letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with the HR & EHS Director and Sr. EHS Specialist prior to exiting the facility.