

Mr. Marvin Gobles
CTS Corporation
905 West Boulevard North
Elkhart, IN 46514

Re: Response to Request for Review
RR 039-11618-00063

Dear Mr. Gobles:

Your letter requesting review for the removal of the following conditions from CTS Registration (039-10761) issued on July 21, 1999, was received on December 2, 1999. CTS Corporation, located at 905 West Boulevard North, Elkhart, Indiana, requested review of the following issues:

1. CTS was concerned that their registered source would be required to have a qualified observer on staff to measure opacity and assure that the source is within the limitations stated under the conditions of the registration. The CTS source does not have any visible opacity conditions. The CTS source conducts annual natural gas fired boiler shut downs and start ups, but no visible opacity emissions are emitted during those processes.
2. CTS additionally was concerned that their registered source would be required to meet Cold Cleaner Degreaser Operations and Controls. CTS utilizes parts cleaners that are owned and maintained by an outside service company.
3. The registration conditions also require CTS to submit an annual emission report. CTS wants guidance on whether that report will be necessary, and if all emissions need to be reported, or just the NOx emissions.
4. CTS wants to know if they will need to keep track of the material used in the soldering processes in order to prove the allowable PM emissions do not exceed 0.551 pounds per hour.

The Office of Air Management (OAM) has reviewed the issues discussed above and made the following determinations:

1. The opacity limitation pursuant to 326 IAC 5-1-2 listed in the Registration (039-10761) as Condition number three (3) cites both the limitation and method to demonstrate compliance with 326 IAC 5-1-2. CTS will need to comply with this limitation but does not have an obligation to demonstrate compliance. Anyone, typically IDEM compliance personnel, wanting to establish compliance or non-compliance would need to be qualified as a Method nine (9) observer and follow those procedures. For clarification, visible emissions can be performed by a trained employee. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. There will be no change made to the permit as a result of this comment.
2. Since CTS solely uses the cold cleaners located within the plant, it is CTSs responsibility to ensure that the outside service company is in compliance with the requirements. Unless a determination would be made that decided that CTS and the parts cleaners were considered separate sources, CTS will be held responsible for all equipment and applicable requirements at their source. Therefore, there will be no change made to the Registration (039-10761) unless a

different determination is made, and CTS will be responsible to meet the applicable Cold Cleaner Degreaser Operations and Controls requirements.

3. Pursuant to 326 IAC 2-6 (Emission Reporting) CTS is required to annually submit an emission statement for the source. 326 IAC 2-6 is applicable to the source even though it is a registration level permit due to the facts that the source is located in Elkhart county and has the potential to emit Volatile Organic Compounds (VOC) or oxides of Nitrogen (NOx) at levels equal to or greater than 10 tons per year. There will be no change made to the permit as a result of this comment.
4. 326 IAC 6-3-2 is an applicable requirement to this source. Based on the throughput data already provided to OAM it has been determined that at the sources maximum capacity, the PM limitation from 326 IAC 6-3-2 of 0.551 pounds per hour will not be exceeded. Therefore, reporting is not necessary to verify compliance with 326 IAC 6-3-2 as long as there are no significant changes in the maximum capacity. There will be no change made to the permit as a result of this comment.

If you have questions regarding this letter, please contact Lynn Riddle at 317/233-2627 or at 1-800-451-6027 ext 3-2627.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

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cc: File - Elkhart County
Elkhart County Health Department
Air Compliance Section - Greg Wingstrom
Northwest Regional Office
Technical Support and Modeling - Michelle Boner
Permit Tracking - Janet Mobley