MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Allomatic Products Company
609 East Chaney Street
Sullivan, Indiana 47882

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units 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.

Operation Permit No.: MSOP 153-12089-00015	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance 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 Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates stationary source, that manufactures automotive clutch plates and transmission parts.

Authorized Individual:	Paul Fathauer
Source Address:	609 East Chaney Street, Sullivan, Indiana 47882
Mailing Address:	P. O. Box 267, Sullivan, Indiana 47882
Phone Number:	(812) 268-0322 ext. 245
SIC Code:	3714
County Location:	Sullivan
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) Two (2) new Induction Bonding equipment, which is rated at 1,380 pounds of clutch plates per hour;

(b) One (1) new Degreaser, identified as RM6006 with two (2) compartments, one compartment has a capacity of 336 gallons of liquid wash and the other compartment has a capacity of 336 gallons of liquid rinse. The degreaser has a 1.8 million British Thermal Units (mmBtu/hr) liquid heater, and 0.8 mmBtu/hr dryer;

(c) One (1) natural gas-fired Bonding Oven, identified as RM6007with a heat input rate of 0.5 mmBtu/hr; and

(d) One (1) new Opposed Disk Grinder, identified as #2 which is capable of grinding 1,800 pounds of clutch plates per hour.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

Pursuant to 326 IAC 2-7-4(a)(1)(A)(ii) and 326 IAC 2-5.1-4, the Permittee shall apply for a Title V operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).

(e) Currently, the source is minor. However, the new addition will make the source subject to Part 70 permit requirements. The Permittee shall apply for a Title V operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Modification Status [326 IAC 2-2] [40 CFR 52.21]

(a) The source's modification potential to emit of PM or PM10 is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.3 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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, OAM, 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) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.4 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.5 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and 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.6 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

C.7 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). 326 IAC 6-4-2(4) is not federally enforceable.

Record Keeping and Reporting Requirements

C.8 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.9 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.10 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval 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, OAM, on or before the date it is due.

(c) Unless otherwise specified in this approval, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

C.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) 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, OAM, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

(a)	Two (2) new Induction Bonding equipment, which is rated at 1,380 pounds of clutch plates per hour;
(b)	One (1) new Degreaser, identified as RM6006 with two (2) compartments, one compartment has a capacity of 336 gallons of liquid wash and the other compartment has a capacity of 336 gallons of liquid rinse. The degreaser has a 1.8 million British Thermal Units (mmBtu/hr) liquid heater, and 0.8 mmBtu/hr dryer;
(c)	One (1) natural gas-fired Bonding Oven, identified as RM6007with a heat input rate of 0.5 mmBtu/hr; and
(d)	One (1) new Opposed Disk Grinder, identified as #2 which is capable of grinding 1,800 pounds of clutch plates per hour.

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the new Opposed Disk Grinder, identified as #2 shall not exceed 3.8 pounds per hour when operating at a process weight rate of 1800 pounds per hour.

The pounds per hour limitation was calculated with the following equation:
Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

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

D.1.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.3 Particulate Matter (PM)

The dust collector for PM control shall be in operation at all times when the new Opposed Disk Grinder, identified as #2 is in operation.

D.1.4 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the Opposed Disk Grinder #2 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Malfunction Condition

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

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

(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]

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the results of the baghouse inspections required under Condition D.1.4 and the dates the vents are redirected.

(b) To document compliance with Conditions D.1.1 the Permittee shall maintain records of the monthly process rates. Records shall include monthly production reports.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

An Annual Notification to document compliance with the requirements under this permit shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

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).

Company Name:	**Allomatic Products Company**
Address:	**609 East Chaney Street, Sullivan, Indiana 47882**
County:	**Sullivan**
Phone #:	**(812) 268- 0322 ext. 245**
MSOP #:	**153-12089-00015**

I hereby certify that **Allomatic Products Company** is **9** still in operation.
9 no longer in operation.

I hereby certify that **Allomatic Products Company** is **9** in compliance with the requirements of MSOP**153-12089-00015**.
9 not in compliance with the requirements of MSOP**153-12089-00015**.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

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 ?_____, 100TONS/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: Allomatic Products Company PHONE NO. (812) 268-0322 ext. 245
LOCATION: 609 East Chaney Street, Sullivan, Indiana 47882
COUNTY: Sullivan
PERMIT NO. MSOP 153-12089-00015 INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a New Source Review (NSR) and Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	Allomatic Products Company
Source Location:	609 East Chaney Street, Sullivan, Indiana 47882
County:	Sullivan
SIC Code:	3714
MSOP No.:	153-12089-00015
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed a MSOP application from Allomatic Products Company and RayMan Company, LLC relating to the operation of the following equipment, to be used in the manufacture of automobile clutch plates, and transmission parts:

(a) Two (2) new Induction Bonding equipment, which is rated at 1,380 pounds of clutch plates per hour;

(b) One (1) new Degreaser, identified as RM6006 with two (2) compartments, one compartment has a capacity of 336 gallons of liquid wash and the other compartment has a capacity of 336 gallons of liquid rinse. The degreaser has a 1.8 million British Thermal Units (mmBtu/hr) liquid heater, and 0.8 mmBtu/hr dryer;

(c) One (1) natural gas-fired Bonding Oven, identified as RM6007with a heat input rate of 0.5 mmBtu/hr; and

(d) One (1) new Opposed Disk Grinder, identified as #2 which is capable of grinding 1,800 pounds of clutch plates per hour.

Source Definition

This automobile clutch plate and transmission parts manufacturing company consists of two (2) plants:

(a) Allomatic Products Company is located at 609 East Chaney Street, Sullivan, Indiana 47882; and

(b) RayMan Company, LLC is located at 312 South Street, Sullivan, Indiana 47882.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. The source has requested that for permit tracking purposes, the name Allomatic Products Company will be used for the whole source.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
S3 (Allomatic Plant)	Induction Bonders	24	2.5	10,000	100
S3 (RayMan Plant)	Degreaser Combustion Stack	24	1.0	900	120
S4 (RayMan Plant)	Bonding Oven	24	0.83	160	400
S6 (RayMan Plant)	Degreaser Mist Removal Stack	24	0.5	750	500

Recommendation

The staff recommends to the Commissioner that the MSOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete application for the purposes of this review was received on March 17, and 23, 2000. Additional information was received on April 17, 2000.

Emission Calculations

(a) Induction Bonding Emissions:

Pre-cured friction paper is assembled with a steel core that has been adhesive coated by the existing permitted Glue Coating equipment and then dried by the existing permitted Glue Oven. The assembly is then heated through induction power and pressed with hydraulic cylinders by the proposed Induction Bonder.

No volatile organic compounds (VOC) nor hazardous air pollutant (HAP) are emitted, from the induction bonding. Most of the VOC and HAP are emitted by the existing permitted Glue Coating process, and Glue Oven, where the parts to be induction bonded are processed first.

(b) Degreaser and Bonding Oven Combustion Emissions: See Page 1 of 1 TSD Appendix A, for detailed calculations.

(c) Degreasing Operation Emissions:

No VOC or HAP will be emitted from the degreasing operation, because the liquid to be used for cleaning, does not contain VOC nor HAP.

(b) New Opposed Disk Grinder #2 Emissions:

(1) Maximum Production Rate: 9,600 pc/hr per grinder * 2 grinders = 19,200 pc/hr

(a) Part Specification:
(b) 5.6 in OD
(c) 4.6 in ID
(d) Core Mass = 0.077 lbs
(c) Wafer Mass = 0.008 lb/wafer * 2 = 0.017 lb
(d) Assembly Mass = 0.094 lbs

(2) 0.016 in. material removed = 0.008 in/side * 2
(3) Paper Density = 0.022 lb/in^3
(4) Dust Density = 0.008 lb/in^3
(5) Ventilation Per Grinder = 1700 acfm *2 = 3400 acfm
(6) Dust Collection Efficiency = 95%

Calculations:

(1) Volume of Material Removed

$$V = \frac{B\,(5.6^2 - 4.6^2)}{4} * 0.016 \text{ in.} = 0.128 \text{ in}^3$$

(2) Mass Removed Per Part:
m = paper density, 0.022 lb/in^3 * V, 0.128 in^3
= 2.816 x 10^{-3} lb/pc

m = 19,200 pcs/hr * 2.816 x 10^{-3}
= 54.1 lb/hr

(3) Assuming 100% Capture and 95% Removal
m_{in} = 54.1 lb/hr
= 237 tons/yr **PM/PM10 uncontrolled emissions**

m_{out} = 2.7 lb/hr
= 11.8 tons/yr **PM/PM10 controlled emissions**

Grain Loading = 54.1 lb/hr * hr/60 min * min/10,000 acf * 7000 gr/lb
= 0.63 gr/ft^3

(4) Part Throughput = 19,200 pc/hr * 0.094 lb/pc
= 1802 lb/hr

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	237
PM-10	237
SO_2	0.0
VOC	0.1
CO	1.1
NO_x	1.4

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Justification for Level of Approval

The source's modification in this application will emit PM and PM10 at levels greater than 100 tons per year. Therefore, it will be issued a Minor Source Operating Permit (MSOP), pursuant to 326 IAC 2-6.1.

After the construction and operation of the proposed equipment in this permit, the source will be subject to 326 IAC 2-7, Part 70 Permit Program. The source can choose to operate under the Part 70 Permit Program or the Federally State Operating Permit Program. The source is required to submit either a Part 70 permit application or a FESOP application 12 months after the issuance of this MSOP.

Originally, the source has submitted a FESOP (F-153-6936-00015) on October 16, 1996. However, later on Scott Pan of Enviroplan Consulting, who was reviewing the FESOP application had informed Allomatic Products Company that they no longer fall under the Title V nor the FESOP Programs, since the source had dismantled the facilities permitted under CP153-2264 that made their emissions below the applicability levels.

IDEM, OAM also verified Enviroplan's findings.

Source Status

Existing Source PSD Definition (emissions, based from the air approvals issued to the source):

Air Approval Number	Date Issued	Permitted Emissions
CP153-5013	February 5, 1996	VOC = 2.5 ton/yr
CP153-2264		All permitted facilities were dismantled.
CP153-10144	February 10, 1999	VOC = 1.6
Total		VOC = 4.1 ton/yr

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Limited/Controlled Potential to Emit (Modification)

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Induction bonding Emissions	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Degreaser and bonding oven combustion emissions	0.0	0.1	0.0	0.1	1.1	1.4	0.0
Degreasing operation emissions	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Opposed Disk Grinding Emissions	11.8	11.8	0.0	0.0	0.0	0.0	0.0
Total Emissions	11.8	11.9	0.0	0.1	1.1	1.4	0.0

County Attainment Status

The source is located in Sullivan County.

Pollutant	Status (attainment, maintenance attainment or unclassifiable; severe, moderate, marginal, or nonattainment)
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	not determined

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Sullivan County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS):
There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):

(1) 40 CFR Part 63.460, Subpart T - Halogenated Emission Standards for Halogenated Solvent Cleaning. The proposed degreaser, identified as RM6006 is not subject to this NESHAP, because no halogenated solvent will be used in the cleaning process.

(2) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

(a) 326 IAC 2-6 (Emission Reporting)
The source is not subject to this rule, because it doesn't have a PTE for any pollutant at levels equal to or greater than 100 tons per year. Secondly, it is not subject to this rule because it is not located in any of the counties listed in the rule that has a PTE of VOC or NOx at levels equal to or greater than 10 tons per year.

(b) 326 IAC 5-1 (Visible Emissions Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

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

(2) 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.

State Rule Applicability - Individual Facilities

(a) 326 IAC 8-3 (Degreasing Operations)
This rule applies to facilities performing organic solvent degreasing operations.

The one (1) degreaser, identified as RM6006 is not subject to 326 IAC 8-3, because it will not utilize any liquid cleaner that is solvent based, and no VOC will be emitted from this facility.

(b) 326 IAC 8 (Volatile Organic Sources)
There are no rules in Article 8 that will possibly apply to any of the proposed equipment in this modification, because no VOC will be emitted.

(c) 326 IAC 6-3-2 (Process Operations)
This rule mandates a PM overspray emissions limit for the new Opposed Disk Grinder #2 using the following equation:

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

$E = 4.10\ P^{0.67}$
$= 4.10\ (1800/2000)^{0.67}$
$= 3.8$ lb/hr

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

This facility is in compliance using a dust collector to control the PM emissions. The PM emissions after control of 2.7 lb/hr are less than the PM limit of 3.8 lb/hr.

(d) 326 IAC 6-2 (Particulate Emission Limitation for Indirect Heating Facilities)
The degreaser's liquid heater, and dryer; and the bonding oven are not subject to 326 IAC 6-2, because they are not sources of indirect heating.

(e) 326 IAC 2-4.1-1 (New Source Toxic Control)
This rule applies to owners or operators who constructs or reconstructs a major source of hazardous air pollutants (HAPs), after July 27, 1997.

This rule is not applicable to this modification because no hazardous air pollutant (HAP) will be emitted.

Conclusion

The operation of this modification shall be subject to the conditions of the attached proposed **Minor Source Operating Permit No. 153-12089-00015.**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

degreaser:
solution heat @ 1.8 mmBtu/hr
dryer @ 0.8 mmBtu/hr
bonding oven @ 0.5 mmBtu/hr

Company Nai Allomatic Products, Co.
Address City 609 South Chaney St., Sullivan, IN 47882
MSOP: 153-12089-00015
Reviewer: Aida De Guzman
Date: April 18, 2000

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.1	27.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.4	0.1	1.1

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
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 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
above
emission